



September 28, 2022

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Further Extension of Special Temporary Authority to Test E220059 in
Standard C-band; Andover, Maine Earth Station E220059

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA"),¹ previously granted to Intelsat² to use its Andover, Maine C-band earth station, Call Sign E220059, to perform antenna verification testing. The antenna will continue to communicate with Intelsat 23 (S2831), Intelsat 34 (S2915), and Intelsat 901 (S2405) in order to verify the antenna performance in advance of commercial operations.³

The testing will continue to be performed in the 3700-4200 MHz (downlink) and 5850-6425 MHz (uplink) frequency bands. Additionally, operations will continue to be consistent with Intelsat's relevant coordination agreements.

The 24x7 contact information for the testing is: Mark Ratcliff at +1 404-381-2839.

In support of this request, Intelsat incorporates by reference Exhibits A, B, and C of its original request,⁴ which contain additional antenna information, a coordination report, and a radiation hazard report, respectively. Operation of the earth station is and will continue to be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

¹ Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System.

² See, e.g., *Satellite Communications Services Information; Actions Taken*, Report No. SES-02501, File No. SES-STA-20220809-00868 (Sept. 21, 2022) (Public Notice).

³ Intelsat has a pending application for authorization for this antenna on a permanent basis. See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, File No. SES-LIC-20220511-00473 (June 22, 2022) (Public Notice).

⁴ See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02482, File No. SES-STA-20220610-00639 (July 13, 2022) (Public Notice).

In February 2020, the Federal Communications Commission (“Commission”) adopted the *C-Band Order*, which requires all incumbent C-band satellite operators to consolidate their telemetry, tracking, and command (“TT&C”) operations within CONUS into four protected locations.⁵ Consistent with this Order, Intelsat submits this request as part of the buildout for its Andover, Maine teleport, which is one of the identified consolidated, protected teleports.⁶ Grant of this further STA extension request will allow Intelsat to ensure its C-band antenna is available for service, which will further the Commission’s objectives in the *C-Band Order* by helping to ensure the successful and timely consolidation of Intelsat’s C-band TT&C operations.⁷ Grant of this request thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this further STA extension request.

Please direct any questions regarding this further STA extension request to the undersigned at (703) 559-7799.

Respectfully submitted,

/s/ W. Ray Rutngamlug

W. Ray Rutngamlug

Associate General Counsel

Intelsat US LLC

cc: Franco Hinojosa

⁵ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 85 Fed. Reg. 22804, ¶ 375 (Apr. 23, 2020) (“*C-band Order*”) at ¶ 375.

⁶ See Letter from Michelle V. Bryan, Executive Vice President, General Counsel and Chief Administrative Officer, Intelsat US LLC on behalf of Intelsat License LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 18-122 and 20-173, at 20-25 (Aug. 14, 2020).

⁷ Prior to adopting the *C-band Order*, the Commission issued a Public Notice temporarily freezing applications for new or modified earth station in the 3700-4200 MHz band. See *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Station and Fixed Microwave Stations in the 3.7-4.2 GHz Band*; 90-day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band, Public Notice, GN Docket Nos. 17-183, 18-122, DA 18-398 (Apr. 19, 2018) (“*C-band Freeze*”). Intelsat believes that STAs are outside of the scope of *C-band Freeze*, but out of an abundance of caution and to the extent necessary, Intelsat seeks waiver of the temporary freeze in order to perform antenna verification testing of this antenna located at its protected Andover, Maine teleport. The Commission may grant a waiver for good cause shown and is appropriate where the particular facts make strict compliance inconsistent with the public interest. 47 C.F.R. § 1.3, *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). As outlined above, good cause exists to waive the *C-band Freeze* in the instant case.