

October 18, 2022

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

Re: Request for Special Temporary Authority
Castle Rock, Colorado Earth Station E040174

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing November 3, 2022, to use its Castle Rock, Colorado C-band earth station, Call Sign E040174, to provide launch and early orbit phase ("LEOP"), in-orbit testing ("IOT"), and telemetry, tracking, and command ("TT&C") services to the Galaxy 31 (S3076),² Galaxy 32 (S3078),³ Galaxy 33 (S3015),⁴ Galaxy 34 (S3083),⁵ Galaxy 35 (S3143),⁶ and Galaxy 36 (S3148)⁷ satellites ("Galaxy Replacement Fleet").⁸ Galaxy 31 and Galaxy 32 are scheduled to launch no earlier than November 3, 2022, Galaxy 33 and Galaxy 34 were launched together on October 8, 2022, and Galaxy 35 and Galaxy 36 are expected to launch together on December 14, 2022. Intelsat expects the LEOP, IOT, and drift periods of each satellite to their final locations to last at approximately 90-100 days.

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

² See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01562, File No. SAT-RPL-20201109-00130 (June 25, 2021) (Public Notice).

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01615, File No. SAT-LOA-20210107-00004 (March 4, 2022) (Public Notice).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01326, File No. SAT-LOA-20170524-00078 (June 29, 2018) (Public Notice).

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01587, File No. SAT-RPL-20210325-00039 (Oct. 22, 2021) (Public Notice).

⁶ See Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 35, a Replacement Satellite, at 95.15° W.L., File No. SAT-RPL-20220414-00041 (filed Apr. 14, 2022).

⁷ See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01664, File No. SAT-LOA-20220607-00058 (Sept. 16, 2022) (Public Notice).

⁸ In support of this request additional operational information, a waiver request, and a coordination report are attached as Exhibits A-C, respectively.

Specifically, Intelsat seeks authority to communicate in the 4000.00 MHz-4200.00 MHz (downlink) and 6415.00 MHz-6425.00 MHz (uplink) frequency bands.⁹

The 24x7 contact information for the mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)
(310) 525-5591 – West Coast Operations Center (back-up)
Request to speak with Kevin Bell or Glen Jones.

The LEOP, IOT, and drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP and drift path and are potentially impacted by IOT.¹⁰ All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. 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.

In February 2020, the Federal Communications Commission (“Commission”) adopted the *C-Band Order*, which requires all incumbent C-band satellite operators to relocate their operations out of the lower C-band frequencies below 4.0 GHz and into the upper C-band frequencies of 4.0-4.2 GHz.¹¹ The Galaxy Replacement Fleet will provide additional upper C-band capacity in furtherance of the Commission’s goal of clearing 3.7-4.0 GHz. Grant of this STA request will allow Intelsat to help launch, test, and place the Galaxy Replacement Fleet into service, which will provide continuity of service and additional upper C-band capacity over the continental United States. Grant of this request will thereby promote the public interest.

Please direct any questions the undersigned at (703) 559-7799.

Respectfully submitted,

/s/ W. Ray Rutngamlug
W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

cc: Franco Hinojosa

⁹ A list of the specific frequencies and frequency bands for each satellite and operation type is included in Exhibit A.

¹⁰ Intelsat will handle the coordination.

¹¹ See *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 85 Fed. Reg. 22804, ¶¶ 149-151 (Apr. 23, 2020) (“*C-band Order*”).

EXHIBIT A

Intelsat Request for STA for Galaxy 35 and Galaxy 36

Earth Station	E040174
Antenna Size (m)	9.0
Transmit Frequencies (MHz)	6418.50, 6420.00, 6420.50, 6421.00, 6422.00, 6422.50, 6423.00, 6424.50 6415.00 -6425.00
Receive Frequencies (MHz)	4195.40, 4196.60, 4196.75, 4197.50, 4197.80, 4198.25, 4198.75, 4199.00, 4199.25, 4199.75 4000.00-4200.00
Emission Designator	1M00F2D
Polarization	Linear and Circular
Bandwidth	1 MHz
Transmit Gain	53.8 dBi @ 6.0 GHz
Maximum EIRP per Carrier (dBW)	80.0
Maximum EIRP Density per Carrier (dBW/4 kHz)	56.0
Site Location	Castle Rock, Colorado
Latitude/Longitude (NAD83)	39° 16' 33.0" N, 104° 48' 34.0" W
Satellite Point(s) of Communication ¹²	Galaxy 31 (S3076) IOT: 148.95 °W.L.; drift to 121.0° W.L. Galaxy 32 (S3078) IOT: 149.05° W.L.; drift to 91.0° W.L. Galaxy 33 (S3015) IOT at final location: 133.0° W.L. Galaxy 34 (S3083) IOT: 147.95° W.L.; drift to 129.0° W.L. Galaxy 35 (S3143) IOT: 150.05° W.L.; drift to 95.15° W.L. Galaxy 36 (S3148) IOT: 149.95° W.L.; drift to 89.0° W.L.
Satellite Type	Geostationary

¹² This STA request includes operation during the LEOP and drift of the satellites.

Exhibit A Continued

Satellite	TT&C transmit frequencies (MHz)	TT&C receive frequencies (MHz)	IOT transmit frequencies (MHz)	IOT receive frequencies (MHz)
Galaxy 31	6422.50, 6424.50	4197.80, 4199.00	6415.00 - 6425.00	4000.00 - 4200.00
Galaxy 32	6422.50, 6424.50	4197.80, 4199.00	6415.00 - 6425.00	4000.00 - 4200.00
Galaxy 33	6421.00, 6424.50	4198.75, 4199.75	6415.00 - 6425.00	4000.00 - 4200.00
Galaxy 34	6420.00, 6423.00	4198.25, 4199.25	6415.00 - 6425.00	4000.00 - 4200.00
Galaxy 35	6418.50, 6420.50, 6422.00, 6424.50	4195.40, 4196.60, 4196.75, 4198.25	6415.00 - 6425.00	4000.00 - 4200.00
Galaxy 36	6422.00, 6422.50, 6424.50	4197.50, 4197.80, 4199.00	6415.00 - 6454.00	4000.00 - 4200.00