



November 16, 2022

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

Re: Request for Extension of Special Temporary Authority
Fillmore, California Earth Station KA391

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 Fillmore, California C-band earth station, Call Sign KA391,³ to provide telemetry, tracking, and command ("TT&C") services during in-orbit testing ("IOT") of Galaxy 31 (S3076)⁴ at 148.95 °W.L., Galaxy 32 (S3078)⁵ at 149.05°W.L., Galaxy 34 (S3083)⁶ at 147.95° W.L., Galaxy 35 (S3143)⁷ at 150.05° W.L., and Galaxy 36 (S3148)⁸ at 149.95° W.L. (the "Galaxy Fleet").

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 Communications Services Information; Actions Taken*, Report No. SES-02512, File No. SES-STA-20220919-01012 (Oct. 26, 2022) (Public Notice).

³ In support of this request Intelsat incorporates by reference Exhibits A-C of its original request, which contain additional operational information, a waiver request, and a coordination report, respectively. To the extent necessary, Intelsat asks for extension of all applicable waivers. *Id.*

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01562, File No. SAT-RPL-20201109-00130 (June 25, 2021) (Public Notice). IOT is expected to begin on or about November 23, 2022, and last approximately 15 days.

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01615, File No. SAT-LOA-20210107-00004 (March 4, 2022) (Public Notice). IOT is expected to begin on or about November 28, 2022, and last approximately 15 days.

⁶ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01587, File No. SAT-RPL-20210325-00039 (Oct. 22, 2021) (Public Notice).

⁷ See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01675, File Nos. SAT-RPL-20220414-00041 and SAT-AMD-20221006-00129 (Oct. 21, 2022) (Public Notice).

⁸ 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).

Galaxy 34 was launched on October 8, 2022, and Galaxy 31 and Galaxy 32 were launched on November 12, 2022. Galaxy 35 and Galaxy 36 are scheduled to launch no earlier than December 14, 2022. All TT&C services to the Galaxy Fleet during IOT are expected to be complete by January 2023.

TT&C service during IOT of the Galaxy Fleet will continue to be performed at the following frequency bands: 6415.0 MHz-6424.0 MHz (uplink); and 4000.0 MHz-4200.0 MHz (downlink).

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.

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.⁹ The Galaxy 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 extension request will ensure the satellites are operating consistent with their authorizations and are capable of using their assigned frequencies. Grant of this request will thereby promote the public interest.

Please direct any questions regarding this STA extension request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Franco Hinojosa

⁹ 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*”).