



November 29, 2022

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

Re: Request for Special Temporary Authority
Nuevo, California Earth Station E170039

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 20 days of Special Temporary Authority ("STA"),¹ commencing December 5, 2022, to use its Nuevo, California Ka-band earth station, Call Sign E170039, to provide in-orbit testing ("IOT") services to Galaxy 31 (S3076) at 148.95° W.L.² Galaxy 31 was launched on November 12, 2022. Intelsat is seeking 20 days of STA to test the Ka-band payload.

Specifically, Intelsat seeks authority to communicate in the 18550 MHz-19300 MHz and 19600 MHz-20200 MHz (downlink) and 28350 MHz-29100 MHz and 29400 MHz-30000 MHz (uplink) frequency bands.³

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-

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). Galaxy 31 is conducting IOT under STA, see Intelsat License LLC, Request for Special Temporary Authority, File No. SAT-STA-20221017-00142 (granted Nov. 21, 2022).

³ Additional operational information is included in Exhibit A.

4.2 GHz.⁴ Galaxy 31 will provide additional upper C-band capacity in furtherance of the Commission's goal of clearing 3.7-4.0 GHz in addition to its Ku- and Ka-band frequencies. Grant of this STA request will allow Intelsat to help test Galaxy 31 and place it into service, which will provide continuity of service and additional Ku-, Ka-, and 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

⁴ 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 31 IOT

Earth Station	E170039
Antenna size (m)	9.2
Transmit Frequencies (MHz)	28350-29100 and 29400-30000
Receive Frequencies (MHz)	18550-19300 and 19600-20200
Emission Designator(s)	800KF2D
Polarization	Linear and Circular
Bandwidth	800 KHz
Transmit Gain	66 dBi at 28350.0 MHz
Maximum EIRP per Carrier (dBW)	81
Maximum EIRP Density per Carrier (dBW/4 kHz)	48
Site Location	Nuevo, California
Latitude/Longitude (NAD83)	33° 47' 42.7" N, 117° 05' 22.5" W
Satellite Point(s) of Communication	Galaxy 31
Satellite Call Sign	S3076
Satellite Type	Geostationary
Satellite Location	148.95° W.L.