



December 5, 2022

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

Re: Request for Special Temporary Authority
Riverside, California Earth Station E060384
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing upon grant, to use its Riverside Ku-band earth station, Call Sign E060384, to conduct in-orbit testing ("IOT") with Galaxy 31 (S3076),² which began today.³ Unexpectedly, the antenna Intelsat was planning to utilize for the IOT of Galaxy 31's Ku-band failed. Therefore, Intelsat is seeking expedited treatment of this STA to begin Ku-band IOT with a different earth station in order to minimize any delays to Galaxy 31 being placed into service. Intelsat expects the Ku-band IOT to be interment for approximately five days, and for the IOT of all bands to last approximately 20 days.

The proposed IOT will be performed at the following frequencies: 12.75-13.25 GHz and 13.75-14.5 GHz (Earth-to-space); and 10.7-11.2 GHz and 11.7-12.45 GHz (space-to-Earth).

The 24x7 contact information for proposed operations 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 proposed operations have been coordinated with all operators of satellites that are potentially affected by these operations at the IOT location.⁴ All operators of potentially affected satellites have been 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

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). The in-orbit testing will occur at 148.95° W.L. The final location will be 121.0° W.L.

³ Intelsat is performing IOT in the other bands on Galaxy 31 while this request is processed.

⁴ Intelsat will handle the coordination.

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should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

In furtherance of the Federal Communications Commission's goal of clearing 3.7-4.0 GHz, expedited grant of this STA request will allow Intelsat to help launch, test, and place Galaxy 31 into service, which will provide continuity of service at the 121.0° W.L. orbital locations. Grant of this request will thereby promote the public interest.

Please direct any questions the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Franco Hinojosa

EXHIBIT A

Intelsat Request for STA to IOT Galaxy 31

Earth Station	E060384
Antenna Size (m)	9
Transmit Frequencies (MHz)	12.75-13.25 GHz and 13.75-14.5 GHz
Receive Frequencies (MHz)	10.7-11.2 GHz and 11.7-12.45 GHz
Emission Designator	1M00F2D
Polarization	Linear and Circular
Bandwidth	1 MHz
Transmit Gain	60.1 dBi at 14.5 GHz
Maximum EIRP per Carrier (dBW)	81
Maximum EIRP Density per Carrier (dBW/4 kHz)	57
Site Location	Riverside, CA
Latitude/Longitude (NAD83)	33° 47' 47.3" N, 117° 5' 15.0" W
Satellite Point(s) of Communication	Galaxy 31 (S3076)
Satellite Type	Geostationary
Satellite Location	148.95° W.L.