



December 21, 2022

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

Re: Request for Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat to use its Hagerstown, Maryland C-band earth station, Call Sign KA275, 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), Galaxy 32 (S3078), Galaxy 35 (S3143), and Galaxy 36 (S3148) satellites ("Galaxy Replacement Fleet").² Galaxy 31 and Galaxy 32 were launched together on November 12, 2022, and Galaxy 35 and Galaxy 36 were launched together on December 13, 2022. Intelsat expects the LEOP, IOT, and drift period for each satellite to take up to 100 days.

Specifically, Intelsat seeks authority to provide TT&C services to the Galaxy Replacement Fleet in the 4000 MHz-4200 MHz and 6415 MHz-6425 MHz 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.

Intelsat has coordinated the LEOP, IOT, and drift operations for all four Intelsat satellites with all operators of satellites that use the same frequency bands and are in the LEOP and drift paths and are potentially impacted by the Galaxy Replacement Fleet's IOT. All operators of satellites in the

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-02517, File No. SES-STA-20221018-01137 (Nov. 17, 2022) (Public Notice). Intelsat's previous STA request included Galaxy 33 and Galaxy 34, which are now both on-station at their permanently licensed orbital locations. Given these facts, Intelsat has omitted both satellites from this extension request.

³ In support of this extension request Intelsat herein attaches Exhibit A and incorporates by reference Exhibits B and C of its previous request, which contain a waiver request and a coordination report, respectively. *Id.*

LEOP and draft paths 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 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 4000 MHz and into the upper C-band frequencies of 4000-4200 MHz.⁴ The Galaxy Replacement Fleet will provide additional upper C-band capacity in furtherance of the Commission’s goal of clearing 3700-4000 MHz. Grant of this STA extension 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) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

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 Replacement Fleet

Earth Station	KA275
Antenna Size (m)	19.2
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	59.1 dBi @ 6.175 GHz
Maximum EIRP per Carrier (dBW)	85.0
Maximum EIRP Density per Carrier (dBW/4 kHz)	61.0
Site Location	Hagerstown, MD
Latitude/Longitude (NAD83)	77° 45' 35.3" N, 39° 35' 54.7" W
Satellite Point(s) of Communication ⁵	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 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

***** Table continued on the next page. *****

⁵ Intelsat's STA request includes operations 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 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