



December 21, 2022

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

Re: Request for Further 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 Intelsat to use its Fillmore, California C-band earth station, Call Sign KA391,² to provide telemetry, tracking, and command ("TT&C") services during the in-orbit testing ("IOT") of Galaxy 32 (S3078) at 149.05°W.L, Galaxy 35 (S3143) at 150.05° W.L., and Galaxy 36 (S3148) at 149.95° W.L. (the "Galaxy Fleet").³ Galaxy 32 was successfully launched on November 12, 2022, and Galaxy 35 and Galaxy 36 were successfully launched on December, 2022. The herein requested TT&C services are now expected to be complete by February 2023.

Specifically, Intelsat requests to continue performing TT&C services within the following frequency bands: 6415 MHz-6424 MHz (uplink); and 4000 MHz-4200 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 Glen Jones or Michael Ryan.

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.

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

³ See, e.g., *Satellite Communications Services Information; Actions Taken*, Report No. SES-02522, File No. SES-STA-20221116-01269 (Nov. 30, 2022) (Public Notice). Intelsat's previous STA request included Galaxy 31, which has since completed IOT. As Intelsat no longer requires authority to provide TT&C services to Galaxy 31 utilizing KA391, the satellite has been omitted from this extension request.

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 Intelsat’s Galaxy Fleet will provide additional upper C-band capacity in furtherance of the Federal Communications Commission’s goal of clearing the lower C-band frequencies. Grant of this further STA extension request will ensure the satellites are operating consistent with their authorizations and are capable of using their assigned frequencies and thereby promotes the public interest.

Please direct any questions regarding this further 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

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”).