



January 9, 2023

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  
**Expedited Treatment Request**

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),<sup>1</sup> commencing January 13, 2023, to use its Nuevo, California Ka-band earth station, Call Sign E170039, to provide in-orbit testing ("IOT") services to Galaxy 35 (S3143)<sup>2</sup> at 150.05° W.L. and Galaxy 36 (S3148)<sup>3</sup> at 149.95° W.L. The satellites were launched together on December 13, 2022. Intelsat expects the IOT to last approximately 15 days for each satellite.

The proposed IOT will be performed at the following frequency bands:

- 18550 MHz-19300 MHz and 19600 MHz-20200 MHz (downlink) and
- 28350 MHz-29100 MHz and 29400 MHz-30000 MHz (uplink).<sup>4</sup>

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 Mike Ryan.

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<sup>1</sup> 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.

<sup>2</sup> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01686, File Nos. SAT-RPL-20220414-00041 (Dec. 9, 2022) (Public Notice). Galaxy 35 is conducting IOT under STA, see *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01690, File No. SAT-STA-20221202-00168 (Dec. 23, 2022) (Public Notice).

<sup>3</sup> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01691, File No. SAT-LOA-20220607-00058 (Jan. 6, 2023) (Public Notice). Galaxy 36 is conducting IOT under STA, see *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01690, File No. SAT-STA-20221202-00169 (Dec. 23, 2022) (Public Notice).

<sup>4</sup> Additional operational information is included in Exhibit A.

The proposed operations are being coordinated with all operators of satellites that are potentially affected by these operations at the IOT location.<sup>5</sup> All operators of potentially affected satellites will be 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.<sup>6</sup> Galaxy 35 and Galaxy 36 will provide additional upper C-band capacity in furtherance of the Commission’s goal of clearing 3700-4000 MHz. Grant of this STA request will allow Intelsat to help test the satellites and place them into service, which will provide continuity of service and additional 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

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<sup>5</sup> Intelsat will handle the coordination.

<sup>6</sup> 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 to IOT Galaxy 35 and Galaxy 36

|                                              |                                   |
|----------------------------------------------|-----------------------------------|
| 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)               | 87                                |
| Maximum EIRP Density per Carrier (dBW/4 kHz) | 64                                |
| Site Location                                | Nuevo, California                 |
| Latitude/Longitude (NAD83)                   | 33° 47' 42.7" N, 117° 05' 22.5" W |
| Satellite Point(s) of Communication          | Galaxy 35                         |
| Satellite Call Sign                          | S3143                             |
| Satellite Type                               | Geostationary                     |
| Satellite Location                           | 150.05° W.L.                      |
| Satellite Point(s) of Communication          | Galaxy 36                         |
| Satellite Call Sign                          | S3148                             |
| Satellite Type                               | Geostationary                     |
| Satellite Location                           | 149.95° W.L.                      |