



January 17, 2023

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

Re: Request for Further Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station E000296

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 E000296, to provide 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 are currently drifting to their permanently licensed locations. Galaxy 35 and Galaxy 36 were launched together on December 13, 2022, and have reached their respective IOT locations. Galaxy 36 is currently undergoing IOT; Galaxy 35 is scheduled to begin IOT once the IOT of Galaxy 36 is complete. Intelsat expects the IOT and drift period for each satellite to take up to 60 days.

Specifically, Intelsat seeks continued authority to communicate in the 4000 MHz-4200 MHz (downlink) and 6415 MHz-6425 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 Glen Jones or Mike Ryan.

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, e.g., *Satellite Communications Services Information; Actions Taken*, Report No. SES-02530, File No. SES-STA-20221202-01312 (Jan. 4, 2023) (Public Notice). Intelsat's previous STA requests included Galaxy 33, Galaxy 34, which are now on-station at their permanently licensed orbital locations. Given these facts, Intelsat has omitted both satellites from this extension request.

³ A list of the specific frequencies and frequency bands for each satellite and operation type is included in Exhibit A.

The IOT and drift operations have or will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path or are potentially impacted by IOT.⁴ All operators of satellites in that path 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 4.0 GHz and into the upper C-band frequencies of 4.0-4.2 GHz.⁵ The Galaxy Replacement Fleet will provide additional upper C-band capacity in furtherance of the Commission’s goal of clearing 3.7-4.0 GHz. Grant of this further STA extension request will allow Intelsat to help 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 further extension request thereby promotes 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 Intelsat will handle the coordination.

⁵ 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 Further Extension of STA for the Galaxy Replacement Fleet

Earth Station	E000296
Antenna Size (m)	9.0
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	53.5 dBi @ 6.175 GHz
Maximum EIRP per Carrier (dBW)	84.7
Maximum EIRP Density per Carrier (dBW/4 kHz)	60.7
Site Location	Hagerstown, MD
Latitude/Longitude (NAD83)	77° 45' 35" N, 39° 35' 54" W
Satellite Point(s) of Communication ⁶	Galaxy 31 (S3076): IOT at 148.95 °W.L. and to 121.0° W.L. Galaxy 32 (S3078): IOT at 149.05° W.L. and to 91.0° W.L. Galaxy 35 (S3143): IOT at 150.05° W.L. and to 95.15° W.L. Galaxy 36 (S3148): IOT at 149.95° W.L. and to 89.0° W.L.
Satellite Type	Geostationary

⁶ Intelsat's request includes operations during the drifts of each satellite from their IOT location to their final location.

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