

February 1, 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 E040125

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing March 6, 2023, to use its Nuevo, California C-band earth station, Call Sign E040125, to provide launch and early orbit phase ("LEOP") and telemetry, tracking, and command ("TT&C") during in-orbit testing (IOT) services for the SES-18 (S3096) and SES-19 (S3097) satellites. SES-18 and SES-19 are expected to launch together on March 6, 2023. Intelsat expects the LEOP and IOT period to last approximately 30 days.

The requested SES-18 operational frequencies are:

- 6421.0 MHz (uplink); and
- 4193.2 MHz, 4197.25 MHz, and 4199.5 MHz (downlink).

The requested SES-19 operational frequencies are:

- 6423.5 MHz (uplink); and
- 4195.2 MHz, 4197.5 MHz, and 4199.5 MHz (downlink).²

Notwithstanding the foregoing, Intelsat may perform TT&C at other frequencies in the full range of the following frequency bands as operational needs may require:

- 5925.0-5930 MHz; 6170-6180.0 MHz; and 6415.0-6425.0 MHz (uplink); and
- 4000.0-4200.0 MHz (downlink)

The 24x7 contact information for the SES-18 and SES-19 missions 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 In support of this request, additional operational information is provided in Exhibit A and a coordination report is attached as Exhibit B.

The LEOP and TT&C at IOT operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path or at the IOT location.³ 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.

Finally, Intelsat clarifies that during the SES-18 and SES-19 LEOP missions, Northrop Grumman will serve as the mission manager. Northrop Grumman will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to Northrop Grumman. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

In furtherance of the Federal Communications Commission's goal of clearing 3700-4000 MHz, grant of this STA request will allow Intelsat to help launch and support testing of SES-18 and SES-19, which will provide additional upper C-band capacity over the continental United States from the 103.05° W.L. and 134.9° W.L. orbital locations, respectively. 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

³ Northrop Grumman, the manager of the SES-18 and SES-19 missions, will handle the coordination.

EXHIBIT A

Intelsat License LLC Request for Special Temporary Authority

Earth Station	E040125
Antenna Size (m)	11.1
Transmit Frequencies (MHz)	6421.0 and 6423.5; 5925.0-5930, 6170-6180.0, and 6415.0-6425.0
Receive Frequencies (MHz)	4193.2, 4195.2, 4197.25, 4197.5 and 4199.5; 4000.0-4200.0
Emission Designator(s)	1M00F2D
Polarization	Linear and Circular
Bandwidth	1 MHz
Transmit Gain	56.8 dBi at 6.2875 GHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61.02
Site Location	Nuevo, CA
Latitude/Longitude (NAD83)	33° 47' 43.4" N, 117° 5' 21.1" W
Satellite Points of Communication, Call Signs; IOT Locations	SES-18 (S3096) IOT at 141.2° W.L. SES-19 (S3097) IOT at 142.8° W.L.
Satellite Type	Geostationary