



February 20, 2023

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

Re: Request for Three Days of Special Temporary Authority  
Nuevo, California Earth Station E040125  
**Expedited Treatment Requested**

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests three days of Special Temporary Authority ("STA"),<sup>1</sup> commencing February 21, 2023, to use its Nuevo, California C-band earth station, Call Sign E040125, to provide launch and early orbit phase ("LEOP") services for the Inmarsat-6 F2 satellite. Inmarsat-6 F2 was launched on February 17, 2023.<sup>2</sup> Due to lower-than-expected Falcon 9 MRS performance, Intelsat requests *immediate* authority to communicate with Inmarsat-6 F2 in order to provide additional ground support to Airbus, the manager of the Inmarsat-6 F2 mission, during the beginning of the Inmarsat-6 2F LEOP.<sup>3</sup>

The proposed operations will be performed at the following frequencies: 5925.5 MHz and 6423.0 MHz; and 4198.35 MHz and 4198.85 MHz.<sup>4</sup>

The 24x7 contact information for the Inmarsat-6 F2 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> Intelsat understands that Inmarsat-6 F2 is licensed by the United Kingdom and that the satellite's final location will be 28.0° W.L.

<sup>3</sup> The rocket's failure to meet specification and the resulting reduced visibility from the earth stations originally slated to support the LEOP is the type of extraordinary event that makes grant of an STA on less than three working days' advance notice appropriate. See 47 C.F.R. § 25.120(a).

<sup>4</sup> While STAs are outside the scope of the temporary freeze on applications for new or modified earth stations in the 3700-4200 MHz band (C-band), out of an abundance of caution and to the extent necessary, Intelsat seeks waiver of the temporary C-band freeze. See Exhibit C.

The proposed TT&C services are in the process of coordination with all operators of satellites that use the same frequency bands and are in the LEOP path.<sup>5</sup> All operators of satellites in that path 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 support of this request, Intelsat herewith attaches Exhibits A-D, which contain additional operational information, waiver requests, and a coordination report.

Finally, Intelsat clarifies that during the Inmarsat-6 F2 mission, Airbus will serve as the mission manager. Airbus 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 Airbus. 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.

Grant of this expedited STA request will allow Intelsat to assist Airbus in safely orbit raising the Inmarsat-6 F2 satellite and thereby promotes the public interest.

Please direct any questions regarding this STA request to Ray Rutngamlug at (703) 559-7799.

Respectfully submitted,

/s/ W. Cynthia J. Grady  
Cynthia J. Grady  
Assistant General Counsel  
Intelsat US LLC

cc: Franco Hinojosa  
Kerry Murray

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

## EXHIBIT A

### Intelsat Request for Special Temporary Authority – Inmarsat-6 F2

|                                              |                                  |
|----------------------------------------------|----------------------------------|
| Earth Station                                | E040125                          |
| Antenna Size (m)                             | 11                               |
| Transmit Frequencies (MHz)                   | 5925.5 and 6423.0                |
| Receive Frequencies (MHz)                    | 4198.35 and 4198.85              |
| Emission Designator(s)                       | 1M00F2D                          |
| Polarization                                 | Circular                         |
| Bandwidth                                    | 1 MHz                            |
| Transmit Gain                                | 55.5 dBi at 6.175 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' 45.1" N, 117° 5' 16.3" W |
| Satellite Point(s) of Communication          | Inmarsat-6 F2                    |
| Satellite Call Sign                          | n/a, see Exhibit B               |
| Satellite Type                               | Geostationary                    |
| Satellite Location                           | n/a                              |