



March 22, 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
Call Sign KA275; Hagerstown, Maryland

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat to use its Hagerstown, Maryland C-band earth station, Call Sign KA275, to communicate with Galaxy 15 (S2387) at power levels higher than authorized by the current license.² On March 7, 2023, Intelsat gained control of Galaxy 15 and six days later stopped the satellite at 108.9° W.L. for evaluation.³

Galaxy 15 experienced an anomaly in August 2022 which resulted in the loss of commanding. From August 2022 until March 2023, the satellite was located outside of its +/- 0.05° East/West station-keeping box while Intelsat diligently worked to regain commanding of the satellite. Intelsat regained commanding of the satellite on March 7, 2023, and drifted the satellite to 108.9° W.L., where Intelsat is currently testing Galaxy 15's functionality pursuant to STA.⁴ As part of this effort, Intelsat requires continued use of the antenna at a power higher than the maximum licensed power.

The operations are being performed in the following uplink frequencies:

- 6025.0 MHz, 6165.0 MHz, and 6420.5 MHz.

The 24x7 contact information for the proposed operations is:

- Intelsat's Network Operations Center +1 404-381-2900. Ask to speak to a supervisor.

¹ Intelsat has filed its STA request, FCC Form 159, a \$220.00 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-02546, File No. SES-STA-20230216-00181 (Mar. 1, 2023) (Public Notice). Intelsat incorporates by reference Exhibits A and B of an earlier request, which include additional technical information and a coordination report, respectively. See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02517, File No. SES-STA-20221027-01230 (Nov. 16, 2022) (Public Notice).

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01709, File No. SAT-STA-20230310-00052 (Mar. 17, 2023) (Public Notice).

⁴ *Id.*

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The operations have been coordinated with all potentially affected satellite operators. All potentially affected satellite operators have been provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. In the 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.

Grant of this further STA extension request is in the public interest. Intelsat's use of the antenna at power levels higher than the levels for which it is currently licensed is necessary to continue commanding of the satellite. Intelsat has taken all practicable steps to ensure safe operation of the earth station and avoid causing harmful interference, including by contacting licensed operators that could be impacted by the requested operations.

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