



March 30, 2023

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

Re: Request for Special Temporary Authority
Call Sign KA258; Hagerstown, Maryland

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing July 15, 2023, to use its Hagerstown, Maryland Ku-band earth station, Call Sign KA258, to provide telemetry, tracking, and command ("TT&C") services to the Galaxy 37 satellite during its launch and early orbit phase ("LEOP"), in-orbit testing ("IOT") at 147.75° W.L., and to its final location of 127.0° W.L.² Galaxy 37 is expected to launch on July 15, 2023. Intelsat expects the LEOP, IOT, and drift services to occur over a 60-day period immediately following the launch.

The Galaxy 37 operations will be initially performed at the following frequencies:

- 14000.50 MHz, 14001.00 MHz, 14498.25 MHz, and 14498.50 MHz (uplink); and
- 11700.50 MHz, 11702.55 MHz, 12197.50 MHz, and 12199.25 MHz (downlink).

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:

- 14000.00-14500.00 MHz (uplink); and
- 11700.00-12200.00 MHz (downlink).

The 24x7 contact information for the Galaxy 37 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.

The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.³ 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

¹ Intelsat has filed its STA request, FCC Form 159, the applicable 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.

³ Maxar, the manager of the Galaxy 37 mission, will handle the coordination.

transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Finally, Intelsat clarifies that during the Galaxy 37 mission, Maxar will serve as the mission manager. Maxar 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 Maxar. 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 STA request will allow Intelsat to help launch the Galaxy 37 satellite. This will allow Galaxy 37 to provide additional upper C-band capacity in furtherance of the Federal Communications Commission's goal of clearing 3.7-4.0 GHz and 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

EXHIBIT A

Intelsat's Request for STA to provide LEOP and TT&C services for Galaxy 37

Earth Station	KA258
Antenna Size (m)	14.2
Transmit Frequencies (MHz)	14000.50, 14001.00, 14498.25, and 14498.50; 14000.00-14500.00
Receive Frequencies (MHz)	11700.50, 11702.55, 12197.50, and 12199.25; 11700.00-12200.00
Emission Designator(s)	1M00F2D
Polarization	Linear and Circular
Bandwidth	1 MHz
Transmit Gain	64.5 dBi at 13.750 GHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61.02
Site Location	Hagerstown, MD
Latitude/Longitude (NAD83)	39° 35' 54" N, 77° 45' 33" W
Satellite Point(s) of Communication	Galaxy 37
Satellite Call Sign	S3164
Satellite Type	Geostationary
Satellite Location	n/a