

**Intelsat License LLC
Request for Special Temporary Authority
E202208; Brewster, Washington**

Intelsat License LLC (“Intelsat”) herein requests 30 days of Special Temporary Authority (“STA”), commencing upon grant but no later than July 21, 2026, to use its Brewster, WA earth station, E202208, to provide telemetry, tracking, and command (“TT&C”) services for the UK-licensed HYLAS-2 satellite during its drift from 72.5° W.L. to 31.0° E.L.

Specifically, Intelsat is seeking authority to provide TT&C support to HYLAS-2 utilizing the 6723.75 MHz (Earth-to-space) and 4198.0 MHz and 4199.0 MHz (space-to-Earth) center frequencies. With the exception of HYLAS-2 as a point of contact, the authority sought herein falls within the scope of the permanent license, which Intelsat incorporates by reference.¹ Consistent with precedent,² Intelsat seeks a waiver of market access in Exhibit B.

In the extremely unlikely event that harmful interference should occur due to transmission to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference. The stop buzzer contact for the requested operations is as follows:

24x7 Intelsat Network Operations Center (NOC)
404-381-2900
NOC Director: Angela Wheeler
Address: 2875 Fork Creek Church Road
Ellenwood, GA 30294-1224 USA
Email: angela.wheeler@ses.com
Office: 404-381-2820
Mobile: 202-437-1619

Grant of the instant STA request will serve the public interest by allowing Intelsat to support the safe relocation of HYLAS-2 to 31.0° E.L. For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request.

Respectfully submitted,

Cynthia J. Grady
Assistant General Counsel
SES Americom Inc.
on behalf of Intelsat License LLC

cc: Franco Hinojosa

¹ See Intelsat License LLC Application for Brewster, WA Earth Station, ICFS File No. SES-LIC-20201222-01428, Stamp Grant (granted Oct. 24, 2022). Additionally, Intelsat provides mission specific technical parameters in Exhibit A.

² See Intelsat License LLC Request for Special Temporary Authority, ICFS File No. SES-STA-20260526-01441, Stamp Grant (granted June 5, 2026).

Exhibit A

Intelsat License LLC Request for Special Temporary Authority

Earth Station	E202208
Antenna Size (m)	13.1
Transmit Frequencies	6723.75 MHz
Receive Frequencies	4198.0 MHz and 4199.0 MHz
Emission Designator(s)	1M00F2D
Polarization	Circular
Bandwidth	1 MHz
Transmit Gain	57.0 dBi @ 6720 MHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61
Site Location	Brewster, Washington
Latitude/Longitude (NAD83)	48° 08' 45.8" N, 119° 41' 50.0" W
Satellite Point(s) of Communication	HYLAS-2
Satellite Call Sign	N/A
Satellite Type	Geostationary
Satellite Location	N/A

Exhibit B
Request for Waiver of Sections 25.137 and 25.114

Pursuant to Section 25.137 of the Federal Communications Commission’s (“Commission” or “FCC”) rules, earth station applicants are required to seek market access to communicate with non-U.S. licensed satellites and must provide the same legal and technical information for the non-U.S.-licensed space station as required by Section 25.114 for U.S.-licensed space stations.¹ Intelsat License LLC (“Intelsat”) herein seeks authority to provide only telemetry, tracking, and command (“TT&C”) services—not commercial services—to the United States, and thus believes that Section 25.137 does not apply.²

To the extent the Commission determines, however, that Intelsat’s request for authority to provide TT&C services on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission’s rules.³ The Commission may grant a waiver for good cause shown.⁴ The Commission typically grants a waiver where it would not undermine the purpose of the rule and is consistent with the public interest.⁵ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁶

In this case, good cause exists for a waiver of Section 25.137—and by extension Section 25.114—of the FCC’s rules. With respect to Section 25.137, Intelsat seeks authority only to provide TT&C services for the HYLAS-2 satellite during its drift from 72.5° W.L. to 31.0° E.L. The Commission has previously waived market access requirements for TT&C only operations between U.S.-licensed earth stations and non-U.S.-licensed satellites.⁷ Accordingly, the purpose of Section 25.137 would not be frustrated by grant of this waiver request. In addition, any additional information beyond what is provided in this STA request that is required by Section 25.114 is not relevant to the TT&C services requested herein. Moreover, as with any STA, Intelsat will perform the TT&C services on a non-interference basis.

For the reasons above, Intelsat respectfully requests that waivers of Section 25.137 and 25.114 of the Commission’s rules be granted.

¹ 47 C.F.R. § 25.137.

² See *EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, Order and Authorization, 28 FCC Rcd 4229 (2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute “DBS service”).

³ 47 C.F.R. §§ 25.137 and 25.114.

⁴ *Id.* § 1.3.

⁵ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“Northeast Cellular”).

⁶ *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁷ *Intelsat License LLC, Request for 30-day STA*, ICFS File No. SES-STA-20250905-00637, Stamp Grant, Condition 9 (granted Nov. 20, 2025) (granting waiver of Sections 25.114 and 25.137 for TT&C, citing lack of commercial services being provided to the U.S.).