

Intelsat License LLC
Request for Special Temporary Authority
ATL-D25; Ellenwood, GA

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”) to operate ATL-D25, a 7.4m Ku-band antenna located in Ellenwood, GA for testing and customer service with E50WA,¹ a French-licensed, in-orbit inclined satellite currently operating at the 50.3° W.L.

Specifically, Intelsat requests STA consistent with the scope of authority previously granted by the Federal Communications Commission,² as described in Intelsat’s original request and associated grant, attached herein for reference as Attachments A and B, subject to the more limited scope of authority described herein.³ Grant of this STA extension is in the public interest because it will allow Intelsat to continue to test and provide customer service with E50WA pending grant of Intelsat’s request for permanent authority.

Respectfully submitted,

/s/ Daniel C.H. Mah

Daniel C.H. Mah

Vice President, Legal & Regulatory Affairs
SES Americom Inc.

on behalf of Intelsat License LLC

cc: Franco Hinojosa

¹ E50WA has been renamed multiple times during its life. Most recently, the satellite was named E12WG. The satellite’s international designator is 2008-065A.

² See *Intelsat License LLC, Request for 30-day STA*, Stamp Grant, ICFS File No. SES-STA-20260303-00599 (granted Mar. 17, 2026).

³ Specifically, Intelsat’s previous scope of authority included authority for operations in the 10.7-12.7 GHz (space-to-Earth) frequency range. However, Intelsat intends to only utilize the 10.2-12.2 GHz (space-to-Earth) range when communicating with E50WA, in addition to the 17.3-17.7 GHz (Earth-to-space) frequencies previously authorized. All other parameters requested herein remain unchanged as described in Attachments A and B below.

ATTACHMENT A

Intelsat License LLC Request for Special Temporary Authority ATL-D25; Ellenwood, GA

Intelsat License LLC (“Intelsat”) herein requests 30 days of Special Temporary Authority (“STA”), commencing upon grant but no later than Friday, March 7, 2026, to operate ATL-D25, a 7.4m Ku-band antenna located in Ellenwood, GA to communicate with E50WA,¹ a French-licensed, in-orbit inclined satellite currently operating at the 50.3° W.L., to test the antenna and provide commercial service. Intelsat is seeking STA to communicate with E50WA while Intelsat’s application to operate the satellite at the 50.3° W.L. orbital location under a U.S. licensing authority is pending.² Intelsat intends to seek a permanent license for the requested operations herein.

Specifically, Intelsat is seeking authority to communicate with E50WA in the 10.7-12.7 GHz (space-to-Earth) and 17.3-17.7 GHz (Earth-to-space).³ 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

In support of this request, Intelsat respectfully requests a waiver of Section 25.137 of the Federal Communications Commission’s (“Commission” or “FCC”) rules.⁴ The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more

¹ E50WA has been renamed multiple times during its life. Most recently, the satellite was named E12WG. The satellite’s international designator is 2008-065A.

² See Request of Intelsat License LLC for Authority to Operate E50WA, ICFS File No. SAT-LOA-20260130-00070 (filed Jan. 30, 2026) (“E50WA Application”). Detailed information regarding the specific technical parameters governing the operations of E50WA is available in Intelsat’s pending application and, to the extent necessary, is incorporated herein by reference.

³ Technical parameters are provided in Exhibit A.

⁴ 47 C.F.R. § 25.137.

⁵ 47 C.F.R. §1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

effective implementation of overall policy on an individual basis.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive Section 25.137. As a result of its recent merger with SES, Intelsat is in the process of conducting extensive alignment of its combined fleet to best meet operational needs post-merger. Waiver of Section 25.137 will allow Intelsat to immediately begin testing and providing customer services with E50WA with ATL-D25, while the pending relicensing of E50WA is ongoing. Conversely, strict enforcement of Section 25.137 would pose undue hardship on Intelsat without serving the policy objectives underlying the rule. Upon grant of Intelsat's pending application to permanently operate E50WA at the 50.3° W.L. location under a U.S. license, Section 25.137 will no longer apply to E50WA and the impact and policy rationale underlying the rule will become moot. Accordingly, denying the requested waiver and delaying Intelsat's ability to begin testing and to provide customer services at the 50.3° orbital location would not be in the public interest nor serve the underlying purpose of Section 25.137. Given these particular facts, the waiver sought herein is plainly appropriate.⁸

Grant of the instant STA request will serve the public interest by allowing Intelsat to begin utilizing the E50WA satellite and increase the available capacity at the 50.3° W.L. location pending the Commission's grant of Intelsat's pending application to permanently operate the satellite at that location under a U.S. license. For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
SES Americom Inc.

on behalf of Intelsat License LLC

cc: Franco Hinojosa

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁸ See 47 C.F.R. § 25.137(d). Intelsat notes that the information required by Section 25.137(b) may be satisfied by cross-reference to a pending satellite application containing the requisite information, as Intelsat does here. See *id.* §25.137(b).

Exhibit A

Intelsat License LLC Request for Special Temporary Authority

Earth Station	ATL-D25
Antenna Size (m)	7.4
Transmit Frequencies (GHz)	17.3-17.7 GHz
Receive Frequencies (GHz)	10.7-12.7 GHz
Emission Designator(s)	36M0G7W
Polarization	Linear (H, V)
Bandwidth	400 MHz
Transmit Gain	60.5 dBi
Maximum EIRP per Carrier (dBW)	65.0
Maximum EIRP Density per Carrier (dBW/4 kHz)	65.0
Site Location	Ellenwood, Georgia
Latitude/Longitude (NAD83)	33° 39' 47.29" N, 84° 16' 12.9" W
Satellite Point(s) of Communication	E50WA
Satellite Call Sign	N/A
Satellite Type	Geostationary
Satellite Location	50.3° W.L.

ATTACHMENT TO GRANT
Intelsat License LLC
ICFS File No. SES-STA-20260303-00599

ICFS File No(s):	SES-STA-20260303-00599	GRANTED - With Conditions  Space Bureau
Licensee/Grantee:	Intelsat License LLC	
Call Sign:		
Satellite Name:	E50WA satellite (licensed by France)	
Orbital Location: (required station-keeping tolerance)		
Administration:		
Nature of Service:		
Scope of Grant:	Intelsat License LLC ("Intelsat"), is granted a 30-day special temporary authority (STA), to operate its 7.4m ATL-D25 Ku-band antenna for testing and commercial services using the E50WA satellite, licensed by France.	
Service Area(s):	33° 39' 47.29" N, 84° 16' 12.9" W in Ellenwood, GA	
Frequencies:	Operations will be performed at the following center frequencies: 17.3-17.7 GHz (Earth-to-space) 10.7-12.7 GHz (space-to-Earth)	

Operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:

1. STA operations must not exceed the operational power levels and parameters requested and coordinated.
2. STA operations must use the minimum power level necessary to establish communications links in order to minimize potential interference to licensed users.
3. All operations under this grant of STA must be on an unprotected and non-interference basis (NIB), i.e., Intelsat must not cause harmful interference to and must not claim protection from interference caused to it by any other lawfully operating station.
4. In the event of any harmful interference caused by operations under this grant of STA, Intelsat must immediately cease operations upon notification of such interference. Intelsat must immediately inform the Commission, in writing, of such an event.
5. The 24/7 point of contact in the United States, with authority and ability to cease all emissions, for this operation is the Intelsat Network Operations Center (NOC) at +1 (404) 381-2900.
6. Grant of this STA does not constitute approval of U.S. market access.
7. All operations under this grant of STA shall comply with all existing and future space station coordination agreements reached between France and other administrations.
8. This STA is granted with a waiver of Commission's Rules 47 CFR §§ 25.137 and 25.114 to test the antenna and provide commercial services with the E50WA satellite while Intelsat's request for authority to operate, ICFS File No. SAT-LOA-20260130-00070, is pending.
9. STA operations must be in compliance with earth station applicable operations allowed by the space station authorization(s) or grant(s), including all relevant conditions, waivers, and findings therein.

This grant is issued pursuant to section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release. This STA is authorized pursuant to the Commission's rule 47 CFR § 25.120.

Action Date:	03-17-2026
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Term Dates	From: 03-18-2026	To: 04-16-2026
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