

**Intelsat License LLC
Request for Special Temporary Authority
E120008; Haleiwa, HI**

Intelsat License LLC (“Intelsat”) herein requests 30 days of Special Temporary Authority (“STA”), commencing June 26, 2026, use its Haleiwa, HI earth station, E120008, to provide temporary on station support services for the UK-licensed ViaSat-3 F3 satellite during the satellite’s in-orbit testing and backup services once the satellite is in service.

Specifically, Intelsat is seeking authority to communicate with ViaSat-3 F3 utilizing the following telemetry, tracking, and command frequencies: 14004.5 MHz, 14496.0 MHz, 14499.0 MHz (Earth-to-space); and 11197.0 MHz, 11198.5 MHz, 11451.0 MHz, 11453.0 MHz (space-to-Earth). In support of this request, Intelsat herewith attaches additional technical parameters as Exhibit A and a waiver request as 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 help bring the ViaSat-3 F3 satellite into service. For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request.

Respectfully submitted,

/s/ Jack Narciso
Jack Narciso
Senior Regulatory Engineer
SES Americom Inc.

Cynthia J. Grady
Assistant General Counsel
SES Americom Inc.

on behalf of Intelsat License LLC

cc: Franco Hinojosa

Exhibit A
Technical Information

Earth Station	E120008
Antenna Size (m)	9
Transmit Frequencies	14004.5 MHz, 14496.0 MHz, 14499.0 MHz
Receive Frequencies	11197.0 MHz, 11198.5 MHz, 11451.0 MHz, 11453.0 MHz
Emission Designator(s)	1M00F2D (Uplink) 500KG2D (Downlink)
Polarization	Circular/Linear (Uplink) Circular/Linear (Downlink)
Bandwidth	1 MHz (Uplink) 500 KHz (Downlink)
Transmit Gain	60.1 dBi @ 14 GHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61
Site Location	Haleiwa, HI
Latitude/Longitude (NAD83)	21°40'17.8"N 158°2'3.5"W
Satellite Point(s) of Communication	ViaSat-3 F3
Satellite Call Sign	n/a
Satellite Type	Geostationary
Satellite Location	158.55E

Exhibit B

Request for Waiver of Sections 25.137 and 25.114

Pursuant to Section 25.137 of the FCC's 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 herein seeks authority to provide only telemetry, tracking, and command ("TT&C") services during in-orbit testing—not commercial services—to the ViaSat-3 F3 satellite, 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 temporary TT&C services for the ViaSat-3 F3 satellite. The Commission has previously waived market access requirements for LEOP and 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 sought 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"); *Intelsat License LLC, Request for 30-day STA*, ICFS File No. SES-STA-20260305-00647, Stamp Grant, Conditions 6, 8 (granted Mar. 5, 2026) (granting waiver of Sections 25.114 and 25.137 for launch and early orbit phase communications based on the limited duration of service and lack of commercial services provided) ("*ViaSat-3 F2 LEOP STA*").

³ 47 C.F.R. §§ 25.137 and 25.114.

⁴ 47 C.F.R. § 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 See *ViaSat-3 F2 LEOP STA*, Conditions 6-8.