

**** EXPEDITED PROCESSING REQUESTED ****
APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

Intelsat License LLC (“Intelsat”) respectfully requests 30 days of Special Temporary Authority (“STA”) **commencing August 27, 2026**, to operate a 7.3m S-band antenna located at its Paumalu, Hawaii teleport to provide telemetry, tracking and command (“TT&C”) for the Launch and Early Orbit Phase (“LEOP”) operations of the German-licensed MTG-i2 satellite scheduled to be launched on that date.

Grant of this STA is being requested on an expedited basis as the United Space Network (“USN”) earth station originally engaged to support the LEOP of MTG-i2 was damaged recently by Hurricane Lala and may not be repaired in time. Expedited grant is in the public interest as it will support the launch of a weather imaging satellite that will provide early detection and observation of dangerous weather condition in near-real time.

The TT&C for LEOP operations will be conducted on the following frequencies:

- 2070.4938 MHz uplink (telecommand and ranging)
- 2248.5 MHz downlink (telemetry)

Maximum EIRP for uplink transmissions will be 65 dBW.

LEOP operations are allowed in both the 2025-2110 MHz and 2200-2290 MHz bands, respectively, see 47 C.F.R. § 2.106, footnotes US94 and US96, subject to coordination with NTIA (in both bands) and with non-Federal fixed and mobile stations (in 2025-2110 MHz). The Commission previously granted STA to USN to use its South Point, Hawaii, antenna to support the same mission using the same frequencies, following coordination with NTIA.¹ SES is prepared to accept the conditions required by NTIA.

Intelsat includes as **Attachment A** a waiver request for section 25.137 and 25.114 of the Commission’s rules to communicate with a non-U.S. licensed satellite for TT&C and LEOP-only services, as well as a Comsearch report relating to coordination with terrestrial Fixed and Mobile services in the band as **Attachment B**.

All operations under the STA will be on a non-protected, non-harmful interference basis. In the unlikely event of reports of harmful interference, please contact the SES Satellite Operations Center on (703) 599-7701.

Please direct any questions to the undersigned,

/s/ Daniel C.H. Mah

Daniel C.H. Mah
Vice President, Legal & Regulatory Affairs
SES Americom, Inc.

¹ See *Universal Space Networks, Inc.*, Grant, ICFS File No. SES-STA-20251126-01066 (granted Mar. 4, 2026).

Attachment A

Request for Waiver of Sections 25.137 and 25.114 *Intelsat Request for Special Temporary Authority – MTG-i2*

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 TT&C and LEOP services—not commercial services—to the MTG-i2 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 and LEOP 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 and LEOP services for the MTG-i2 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 and LEOP services requested herein. Moreover, as with any STA, Intelsat will operate 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.

Attachment B

Prepared By

COMSEARCH

21515 Ridgetop Circle, Suite 300
Sterling, Va. 20166
(703)726-5500 <http://www.comsearch.com>

Prepared For
Intelsat License LLC
Paumalu, HI.

Temporary Transmit-Only Earth Station
Operation Dates: 08/21/2026 - 02/27/2027

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on August 20, 2026.

SUPPLEMENTAL SHOWING

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations.

Coordination data for this earth station was sent to the below listed carriers with a letter dated August 20, 2026.

Company

3G Wireless, LLC
Accelerated Media Technologies
Aerial Video Systems
Ascent Media Network Services, LLC
Bellsouth Telecommunications, Inc.
Borgeson, Tom R.
Broadcast Sports Inc.
Carolina Telephone and Telegraph Co
Casper, John
Chicago Comnet Corp
Cowboys Stadium LP
CP Communications
DCI II, INC.
Fine Satellites & Fiber, LLC
Frontier California Inc.
Global Telecom & Technology Americas, In
Goodyear Tire & Rubber Company
Gray Television Licensee, LLC
HF Enterprises, Inc
Hawaii Public Television Foundation
Hawaiian Telecom Inc.
Heiden, William
Indiana Bell Telephone Company
KITV, Inc
Kentucky RSA #3 Cellular General Partner
Kentucky RSA #4 Cellular General Partner
KTBV License LLC

Lehman, Ronald G
Lumen Technologies Inc
Michigan Bell Telephone Company
Microwave Video Systems, LLC
NorthWest Suburbs Community Access Corp
Ohio Bell GTelephone Company
Onboard Images
Pacific Bell Tel Com dba AT&T California
Quick Link Connections Inc.
Qwest Corporation
RCC Minnesota Inc. - MN NE ND SD
RF Film, Inc
Remote Facilities Consulting Services
SayRabbit LLC
SBE Coordinator
Southwestern Bell Telephone L.P.
TTWN Networks, LLC
VERIZON SOUTH INC.
Verizon Maryland, Inc.
Verizon New England Inc.
Verizon New Jersey, Inc.
Verizon New York, Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania, Inc.
Verizon Virginia, Inc.
Verizon Washington DC, Inc.
Winged Vision Inc
Wisconsin Bell Telephone Company
Wolfe Air Aviation

EARTH STATION COORDINATION DATA

This section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH
Earth Station Data Sheet
21515 Ridgetop Circle, Suite 300
Sterling, Va. 20166

Date: 08/20/2026
Job Number: 260820COMSGE03

Administrative Information

Status	TEMPORARY (Operation from 08/27/2026 to 02/27/2027)
Call Sign	TEMP02
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information**PAUMALU, HI**

Venue Name	
Latitude (NAD 83)	21° 40' 14.1" N
Longitude (NAD 83)	158° 2' 7.1" W
Climate Zone	C
Rain Zone	4
Ground Elevation (AMSL)	149.6 m / 490.8 ft

Link Information

Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Digital
Satellite Arc	83° W to 233° West Longitude
Azimuth Range	95.6° to 264.3°
Corresponding Elevation Angles	5.2° / 5.3°
Antenna Centerline (AGL)	5.49 m / 18.0 ft

Antenna Information**Transmit - FCC32**

Manufacturer	Viasat
Model	7.3FPA)
Gain / Diameter	40.9 dBi / 7.3 m
3-dB / 15-dB Beamwidth	1.00° / 2.00°

Max Available RF Power	(dBW/4 kHz)	0.1	
	(dBW/MHz)	24.1	
Maximum EIRP	(dBW/4 kHz)	41.0	
	(dBW/MHz)	65.0	
Interference Objectives:	Long Term	-154.0 dBW/4 kHz	20%
	Short Term	-131.0 dBW/4 kHz	0.0025%

Frequency Information**Transmit 2.0 GHz**

Emission / Frequency Range (MHz)	1M00G2D / 2070.4938
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Max Great Circle Coordination Distance	799.3 km / 496.6 mi
Precipitation Scatter Contour Radius	108.0 km / 67.1 mi

COMSEARCH

Earth Station Data Sheet

21515 Ridgetop Circle, Suite 300
Sterling, Va. 20166

Coordination Values	PAUMALU, HI		
Licensee Name	Intelsat License LLC		
Latitude (NAD 83)	21° 40' 14.1" N		
Longitude (NAD 83)	158° 2' 7.1" W		
Ground Elevation (AMSL)	149.6 m / 490.8 ft		
Antenna Centerline (AGL)	5.49 m / 18.0 ft		
Antenna Mode	Transmit 2.0 GHz		
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%	
Short Term	-131.0 dBW/4 kHz	0.0025%	
Max Available RF Power	0.1 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	95.62	-10.00	367.60
5	0.00	90.64	-10.00	367.60
10	0.00	85.66	-10.00	367.60
15	0.00	80.68	-10.00	367.60
20	0.00	75.70	-10.00	367.60
25	0.00	70.72	-10.00	367.60
30	0.00	65.75	-10.00	367.60
35	0.00	60.77	-10.00	367.60
40	0.00	55.80	-10.00	367.60
45	0.00	50.83	-10.00	367.60
50	0.00	45.87	-9.54	372.98
55	0.29	40.89	-8.29	353.70
60	0.29	35.93	-6.89	367.96
65	0.30	30.99	-5.28	384.32
70	0.60	26.02	-3.38	314.81
75	0.86	21.07	-1.09	288.07
80	1.14	16.15	1.80	276.87
85	1.45	11.28	5.69	282.15
90	1.70	6.64	11.44	310.55
95	2.03	3.25	19.19	350.48
100	2.53	5.12	14.26	262.92
105	2.72	9.60	7.44	199.95
110	2.60	14.23	3.17	177.92
115	3.32	18.51	0.31	127.79
120	3.11	23.12	-2.10	120.40
125	2.98	27.66	-4.05	113.51
130	3.14	32.02	-5.63	100.00
135	3.00	36.42	-7.03	100.00
140	2.78	40.76	-8.26	100.00
145	2.07	45.19	-9.38	126.86
150	2.20	49.07	-10.00	116.89
155	1.97	52.85	-10.00	128.86
160	2.37	55.93	-10.00	107.14
165	2.43	58.65	-10.00	104.34
170	2.14	60.91	-10.00	119.69
175	2.18	62.06	-10.00	117.56
180	2.03	62.58	-10.00	124.99
185	1.82	62.40	-10.00	137.91

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Earth Station Data Sheet

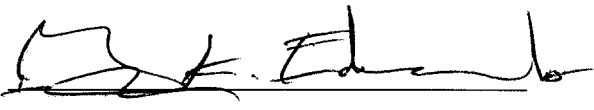
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Ground Elevation (AMSL)	149.6 m / 490.8 ft
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Antenna Mode	Transmit 2.0 GHz
Interference Objectives: Long Term	-154.0 dBW/4 kHz 20%
Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	0.1 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	1.64	61.31	-10.00	150.13
195	1.45	59.31	-10.00	163.08
200	1.09	56.67	-10.00	187.91
205	0.86	53.42	-10.00	214.10
210	0.47	49.89	-10.00	277.70
215	0.29	45.99	-9.57	338.88
220	0.00	41.97	-8.57	384.48
225	0.00	37.69	-7.41	398.86
230	0.00	33.31	-6.06	415.92
235	0.00	28.87	-4.51	436.51
240	0.00	24.36	-2.67	456.43
245	0.00	19.82	-0.43	490.63
250	0.00	15.24	2.42	539.91
255	0.00	10.72	6.25	616.29
260	0.00	6.83	11.13	731.70
265	0.00	5.33	13.83	799.33
270	0.00	7.75	9.77	699.11
275	0.00	11.89	5.12	592.50
280	0.00	16.51	1.55	524.18
285	0.00	21.30	-1.21	478.19
290	0.00	26.17	-3.44	451.10
295	0.00	31.08	-5.31	425.81
300	0.00	36.01	-6.91	405.10
305	0.00	40.95	-8.31	387.73
310	0.00	45.90	-9.55	372.89
315	0.00	50.87	-10.00	367.60
320	0.00	55.83	-10.00	367.60
325	0.00	60.80	-10.00	367.60
330	0.00	65.78	-10.00	367.60
335	0.00	70.75	-10.00	367.60
340	0.00	75.73	-10.00	367.60
345	0.00	80.71	-10.00	367.60
350	0.00	85.69	-10.00	367.60
355	0.00	90.66	-10.00	367.60

CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I AM FAMILIAR WITH PARTS 101 AND 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

BY: 

Gary K. Edwards
Senior Manager
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166

DATED: August 21, 2026