

May 4, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Request for Special Temporary Authority  
Hagerstown, Maryland Earth Station E140121

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 30 days, beginning May 23, 2017, of Special Temporary Authority (“STA”)<sup>1</sup> to use its Mountainside, California Ku-band earth station—call sign E140121—to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 5 (Call Sign S2704) during its drift from 156.9° E.L. to 137.0° W.L.<sup>2</sup> and on station at 137.0° W.L. Intelsat 5 is currently drifting using non-U.S. antennas and is expected to require the use of U.S. antennas on May 13, 2018.<sup>3</sup>

TT&C operations will be performed in the following frequencies: 14498 MHz (H) and 13999 MHz (RHCP) in the uplink; and 11451 MHz (H, V, and RHCP), 11452 MHz (H, V, and RHCP), and 11454 MHz (RHCP, and LHCP) in the downlink. The drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.<sup>4</sup> Once on-station at 137.0° W.L., Intelsat will operate in conformance with FCC rules and any relevant coordination agreements. All

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<sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$200.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> Intelsat originally intended to redeploy Intelsat 5 to 93.2° W.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01311, File No. SAT-STA-20180410-00027 (Apr. 20, 2018) (Public Notice). When the FCC recently made available for reassignment the C-band frequencies at 137° W.L., Intelsat filed to modify the authorization for the Intelsat 5 satellite to instead redeploy it to 137.0° W.L. Intelsat has also filed two STAs in support of the new redeployment. See *Intelsat License LLC, Modification of authorization to Redeploy to, and Operate Intelsat 5 (S2704) at, 137.0 W.L.*, File No. SAT-MOD-20180501-00036 (filed May 1, 2018); *Intelsat License LLC, Request for 30-Day Special Temporary Authority to Drift Intelsat 5 and Operate at, 137.0 W.L., Call Sign S2704*, File No. SAT-STA-20180502-00039 (filed May 2, 2018); *Intelsat License LLC, Request for 180-Day Special Temporary Authority to Operate Intelsat 5 at 137.0 W.L., Call Sign S2704*, File No. SAT-STA-20180502-00040 (filed May 2, 2018).

<sup>3</sup> Intelsat is concurrently filing STA requests for KL92, KA258, and E060384 to support Intelsat 5’s redeployment to 137.0° W.L.

<sup>4</sup> Intelsat will handle the coordination.

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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.

The 24x7 contact information 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 Harry Burnham or Kevin Bell.

In further support of this request, Intelsat herewith attaches Exhibit A, which contains technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, or into Federal systems operating in the 13.75 -14.00 GHz band. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this STA request will allow Intelsat to drift Intelsat 5 to, and safely station-keep the satellite at, its new location. This, in turn, will help meet a new service demand at the 137.0° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais