



**INTELSAT.**

*Envision. Connect. Transform.*

October 23, 2018

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

Re: Request for Further Extension of Special Temporary Authority  
Mountainside, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”),<sup>1</sup> previously granted Intelsat to continue using its Mountainside, Maryland Ku-band earth station—call sign KA258—to provide telemetry, tracking, and command (“TT&C”) services<sup>2</sup> for Intelsat 9 (Call Sign S2380) during its drift from 29.5° W.L. to 66.15° E.L.<sup>3</sup> Intelsat 9 began drifting on May 22, 2018, and the drift is expected to take approximately eight months.

Intelsat has a pending 180-day STA request for TT&C services during Intelsat 9’s drift.<sup>4</sup>

TT&C operations will continue to be performed in the following frequencies: 14.0005 GHz and 14.4945 GHz in the uplink; and 11.7005 GHz and 11.702 GHz in the downlink. The drift operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.<sup>5</sup> All 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. 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.

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<sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> See, e.g. *Satellite Communications Services Information; Actions Taken, Report No. SES-02104*, File No. SES-STA-20181001-02910 (Oct. 10, 2018) (Public Notice).

<sup>3</sup> See *Satellite Policy Branch Information; Actions Taken, Report No. SAT-01332*, File No. SAT-MOD-20180305-00019 (July 20, 2018) (Public Notice); *Satellite Policy Branch Information; Actions Taken, Report No. SAT-01318*, File No. SAT-STA-20180509-00041 (May 18, 2018) (Public Notice).

<sup>4</sup> *Satellite Communications Services Information; Actions Taken, Report No. SES-02083*, File No. SES-STA-20180515-00631 (Aug. 1, 2018) (Public Notice).

<sup>5</sup> Intelsat will handle the coordination.

Ms. Marlene H. Dortch

October 23, 2018

Page 2

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.

Grant of this STA further extension request will allow Intelsat to continue drifting Intelsat 9 to its new location. This, in turn, will add additional capacity at the 66.15° E.L. orbital location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA further extension request. Please direct any questions regarding this STA further extension request to the undersigned at (703) 559-6949.

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Paul Blais