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April 19, 2019

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

Re: Request for Special Temporary Authority
Paumalu, Hawaii Earth Station KA265

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 60 days, commencing May 1, 2019, to use its Paumalu, Hawaii C-band earth station (Call Sign KA265) to provide telemetry, tracking, and command (“TT&C”) services to Telstar 18² at its permanent location of 138.0° E.L.³

The proposed operations will be performed using the following frequencies: 3630.0 MHz (V) in the downlink; and 5850.5 MHz and 6425.0 MHz (CP) in the uplink. Intelsat plans to file an application for a permanent modification to its KA265 license to support Telstar 18 TT&C operations.

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. In the unlikely event that harmful interference occurs, Intelsat will take all reasonable steps to eliminate the interference.

¹ 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”).

² Telstar 18 is also known as Apstar-5.

³ See *Space Station Approval List*, Federal Communications Commission (Dec. 3, 2018), available at <http://transition.fcc.gov/ib/sd/se/ssal.xlsx>; See also, *Policy Branch Information; Actions Taken*, Report No. SAT-02014, File No. SES-MFS-20170906-00982 (Dec. 6, 2017) (Public Notice) (providing market access for Telstar 18 in the E980250 earth station license).

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Grant of this STA request will allow Intelsat to provide TT&C services to the Telstar 18 satellite at 138.0° E.L., which ensures safe station-keeping of the satellite. This, in turn, will help ensure the safety of the geostationary arc 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
Senior Counsel
Intelsat US LLC

cc: Paul Blais