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May 3, 2019

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
Riverside, California Earth Station E060384

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)¹ previously granted Intelsat to use its Riverside, California Ku-band earth station (Call Sign E060384) to continue providing telemetry, tracking, and command (“TT&C”) services² for Intelsat 5 (Call Sign S2704) on-station at 137.0° W.L.³ Intelsat has filed an application to permanently modify this earth station license.⁴

TT&C operations will continue to 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. On-station at 137.0° W.L., Intelsat will continue to operate in conformance with FCC rules and any relevant coordination agreements.

In further support of this request, Intelsat incorporates by reference Exhibits A-D submitted with its original STA request,⁵ which contain technical information that demonstrates that the operation of the

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 See, e.g. *Satellite Policy Branch Information; Actions Taken*, Report No. SES-02144, File No. SES-STA-20190305-00264 (Mar. 13, 2019) (Public Notice).

³ The original STA provided authority for the drift and on-station operations. Intelsat 5 arrived at 137.0° W.L. on May 30, 2018. Intelsat is also utilizing the following antennas on station for Intelsat 5: KL92, E140121, and KA258.

⁴ See, *Intelsat License LLC Modification of Riverside, California Earth Station, Call Sign E060384, to Add Galaxy 11 (S2253) and Intelsat 5 (S2704) as Points of Communication, Freqs, ID*, File No. SES-MFS-20190320-00332 (filed Mar. 20, 2019).

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SES-02062, File No. SES-STA-20180504-00489 (May 16, 2018) (Public Notice).

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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. To provide sufficient interference protection to U.S. Navy shipboard radiolocation operations, Intelsat will continue to operate based on the table provided below for uplink operation in band 13.75-14.00 GHz from Riverside, CA. Using the below mentioned power levels, the earth station's signal flux density toward the shoreline will always be less than -167.0 dBW/m²/4KHz. Therefore, there should be no interference to the U.S. Navy radar systems.

<i>Arc</i>	<i>Power</i>
<i>45 to 190 W</i>	<i>76 dBW</i>
<i>45 to 185 W</i>	<i>82 dBW</i>
<i>45 to 180 W</i>	<i>86 dBW</i>
<i>45 to 175 W</i>	<i>88 dBW</i>

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 further extension request will allow Intelsat to continue safely station-keep Intelsat 5 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 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