

May 15, 2019

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 KA275

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"), commencing June 1, 2019, to use its Hagerstown, Maryland C-band earth station (Call Sign KA275) to provide telemetry, tracking, and command ("TT&C") services for Intelsat 904 (Call Sign S2408) during the satellite's drift from 45.1° E.L. to 29.5° W.L. and on station at 29.5° W.L. Intelsat 904 is currently drifting to 29.5° W.L. and the drift is expected to take approximately six months.<sup>2</sup>

The Intelsat 904 TT&C operations will be performed in the following frequencies: 6173.7 MHz and 6176.3 MHz in the uplink; and 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz 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>3</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.

The 24x7 contact information for the drift of Intelsat 904 is as follows:

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").

See, e.g., Policy Branch Information; Actions Taken, Report No. SAT-01373, File No. SAT-STA-20190205-00005 (Feb. 22, 2019) (Public Notice); see also Intelsat License LLC, Application to Modify Authorization for Intelsat 904 (S2408), File No. SAT-MOD-20190422-00031 (filed April 22, 2019).

Intelsat will handle the coordination.

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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. 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 of Intelsat 904 to its new location. This, in turn, will allow Intelsat to provide new capacity from the 29.5° W.L. orbital location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. 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