



INTELSAT.

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July 16, 2019

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

Re: Request for Special Temporary Authority
Castle Rock, Colorado Earth Station E040174

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to use its Castle Rock, Colorado Ku-band earth station (Call Sign E040174) to provide telemetry, tracking, and command (“TT&C”) services for Galaxy 25 (Call Sign S2154) during the satellite’s drift from 93.1° W.L. to 32.9° E.L. Galaxy 25 began drifting on June 1, 2019, and the drift is expected to take approximately four months.³

The Galaxy 25 TT&C operations will continue to be performed in the following frequencies: 5926.5 MHz and 6423.5 MHz in the uplink; and 4195.5 MHz and 4199.5 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.⁴ 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

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 *Satellite Communications Services Information, Actions Taken*, Report No. SES-02174, File No. SES-STA-20190612-00758 (June 26, 2019) (Public Notice).

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01394, File No. SAT-STA-20190502-00034 (May 31, 2019) (Public Notice).

⁴ Intelsat will handle the coordination.

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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 Galaxy 25 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 incorporates by reference Exhibit A⁵ included with its original STA request, 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 extension request will allow Intelsat to drift of Galaxy 25 to its new location. This, in turn, will allow Intelsat to provide new capacity from the 32.9° E.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais

⁵ See *supra* n. 2.