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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 Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station KA258

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 Hagerstown, Maryland Ku-band earth station (Call Sign KA258) to provide ground segment telemetry, tracking, and command (“TT&C”) services to the T16 satellite (Call Sign S3039).³ Specifically, Intelsat seeks to provide launch and early orbit phase (“LEOP”) services; TT&C during in-orbit testing (“IOT”) at 134.75° W.L.;⁴ TT&C during the satellite’s drift from its IOT location to its final location of 100.85° W.L.; and backup TT&C on-station at 100.85° W.L. T16 was launched on June 20, 2019 and the LEOP, IOT, and drift are expected to take approximately 45 days. Backup TT&C services at 100.85° W.L. will be provided indefinitely and Intelsat will be filing for authority to provide this service on a permanent basis.

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-20190603-00722 (June 26, 2019) (Public Notice).

³ See *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01392, SAT-MOD-20190508-00036 (May 24, 2019) (Public Notice) (seeking modification to change the assigned orbital location of T16 to 100.85° W.L.).

⁴ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01394, SAT-STA-20190508-00037 (May 31, 2019) (Public Notice).

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The T16 TT&C operations will continue to be performed using the following frequencies: 17789.0 MHz and 17791.0 MHz (RHCP) in the uplink; and 12697.0 MHz and 12698.0 MHz (RHCP) in the downlink. The operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.⁵ All operators of potentially affected satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the T16 mission 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.

The proposed TT&C operations at 100.85° W.L. will be consistent with the coordination agreements for the nominal 100.85° W.L. orbital location entered into by DIRECTV Enterprises, LLC – the licensee of T16. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

In further support of this request, Intelsat incorporates by reference Exhibit A⁶ 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.

Finally, Intelsat clarifies that during the T16 LEOP mission, Airbus will serve as the mission manager. Airbus will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to Airbus. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

⁵ Airbus, the mission manager of the T16 mission, will handle the coordination.

⁶ See *supra* n. 2.

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Grant of this STA extension request will allow Intelsat to help safely launch, test, deploy, and station-keep T16. This, in turn, will help support direct-to-home services from the 100.85° W.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