



INTELSAT.

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July 24, 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
Ellenwood, Georgia Earth Station E030306

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat to use its Ellenwood, Georgia C-band earth station (Call Sign E030306) to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 904 (Call Sign S2408) during its drift from 45.1° E.L. to 29.5° W.L.² Intelsat 904 is currently drifting to 29.5° W.L. and the drift is expected to take approximately six months.³

The Intelsat 904 TT&C operations will continue to 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.⁴ All operators of satellites in that path will be

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., *Policy Branch Information, Actions Taken*, Report No. SES-02181, File No. SES-STA-20190628-00856 (July 10, 2019) (Public Notice).

³ See *Application of Intelsat License LLC for Special Temporary Authority to Drift Intelsat 904 to 29.5° W.L.*, File No. SAT-STA-20190717-00064 (filed July 17, 2019); see also *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01390, File No. SAT-MOD-20190422-00031 (May 17, 2019) (Public Notice).

⁴ Intelsat will handle the coordination.

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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:

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 A of the original STA request,⁵ 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 further STA extension request will allow Intelsat to continue to drift 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 Federal Communications Commission grant this further STA extension request. Please direct any questions regarding this 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

⁵ See *supra* at n. 2.