



July 25, 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
Mountainside, Maryland Earth Station KA275

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 Mountainside, Maryland C-band earth station (Call Sign KA275) 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.² Galaxy 25 began drifting on June 1, 2019 and the drift is expected to take approximately four months.³

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 Communications Services Information, Actions Taken*, Report No. SES-02181, File No. SES-STA-20190628-00857 (July 10, 2019) (Public Notice). The stamp grant for SES-STA-20190628-00857 was attached to an incorrect STA request. The file number in the stamp grant does not match the document that it appears on, but does match the IBFS file in which the document is found, file number SES-STA-20190628-00857, and the dates within the stamp grants also match the operational dates found in IBFS. Additionally, the text under the stamp references an earth station STA that supports TT&C operations for a different spacecraft. Intelsat has calculated the due date of this extension request based on the identical dates found in the stamp grant and IBFS. See *Satellite Communications Services Information, Actions Taken*, Report No. SES-02181, File No. SES-STA-20190628-00857 (July 10, 2019) (Public Notice) compared to *Satellite Communications Services Information, Actions Taken*, Report No. 02181, File No. SES-STA-20190628-00846 (July 10, 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).

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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 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 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 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 herewith incorporates the technical information submitted with the most recent application to modify the KA275 license,⁵ which contains technical information that demonstrates that the operation of the antenna 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 antennas, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this further STA extension request will allow Intelsat to continue drifting 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 further STA extension request. Please direct any questions regarding this request to (703) 559-6949.

Respectfully submitted,

/s/ *Cynthia J. Grady*

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais

⁴ Intelsat will handle the coordination.

⁵ See *Satellite Communications Services Information, Actions Taken*, Report No. SES-02017, File No. SES-MOD-20170925-01051 (Dec. 13, 2017) (Public Notice).