



**INTELSAT.**

*Envision. Connect. Transform.*

August 28, 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  
7.3m S-band Antenna, Paumalu, Hawaii

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to IntelSat<sup>2</sup> to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport for telemetry, tracking, and command (“TT&C”) services during launch and early orbit phase (“LEOP”) and in-orbit testing (“IOT”) of the General Atomics Orbital Test Bed (“OTB”) satellite.<sup>3</sup> OTB was launched on June 25, 2019.

OTB was launched as part of the U.S. Air Force’s Space Technology Program (STP-2) and carried the National Aeronautics and Space Administration’s (“NASA”) Deep Space Atomic Clock, the U.S. Air Force’s Modular Solar Array, and other payloads. Because OTB is a low-Earth orbit (“LEO”) non-geostationary orbit satellites (“NGSO”), TT&C services from the S-band antenna to the satellite will occur 1-4 times per day, ranging from 8-10 minutes in duration.<sup>4</sup>

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<sup>1</sup> 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”).

<sup>2</sup> See, e.g., *Satellite Communications Services Information, Actions Taken*, Report No. SES-02188, File No. SES-STA-20190717-00988 (Aug. 7, 2019) (Public Notice).

<sup>3</sup> IntelSat understands that OTB is licensed by the United States.

<sup>4</sup> The planned orbit for the OTB satellite is 720 km with an inclination of 24°.

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The OTB operations will continue to be performed in the following frequencies: 2061.0 MHz, 2062.0 MHz, and 2063.0 MHz (RHCP) in the uplink, and 2272.5 MHz in the downlink (RHCP).<sup>5</sup> The operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the flight paths or are potentially affected by IOT operations.<sup>6</sup> All operators of potentially affected satellites have been 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 OTB operations 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 Exhibits A and B included with its original STA request,<sup>7</sup> which contain 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 commercial terrestrial facility and a waiver request.

Grant of this further STA extension request will allow Intelsat to safely place OTB in non-geostationary orbit; TT&C the spacecraft during IOT; and provide support to U.S. Government missions aboard the OTB satellite 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

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<sup>5</sup> The maximum E.I.R.P. is 48 dBW.

<sup>6</sup> ViaSat, Intelsat's customer, will handle the coordination.

<sup>7</sup> See *Satellite Communications Services Information, Actions Taken*, Report No. SES-02159, File No. SES-STA-20181010-03148 (May 8, 2019) (Public Notice).