

September 4, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Request for Special Temporary Authority  
Hagerstown, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing September 30, 2019, to use its Hagerstown, Maryland C-band earth station (Call Sign KA275) to provide launch and early orbit phase (“LEOP”) services and telemetry, tracking, and command (“TT&C”) services for MEV-1 (Call Sign S2990).<sup>2</sup> MEV-1 is expected to launch on September 30, 2019.

Subject to Federal Communications Commission approval, Intelsat will provide LEOP and TT&C services to MEV-1 during (1) the spacecraft’s LEOP period; (2) MEV-1’s docking with Intelsat 901 (Call Sign S2405)<sup>3</sup> at 300 km above the geostationary arc; (3) the drift as a combined vehicle stack (“CVS”) with Intelsat 901 from 300 km above the geostationary arc to 27.5° W.L.; and (4) as the CVS on-station at 27.5° W.L. on the geostationary arc. Intelsat expects the LEOP and docking to last approximately 125 days and reinsertion to last approximately 45 days.<sup>4</sup> Intelsat will be filing a permanent application to support on-station TT&C operations.

The MEV-1 LEOP and TT&C operations will be performed at the following frequencies: 5924.00 MHz, 5927.50 MHz, 6170.00 MHz, and 6180.00 MHz in the uplink, and 3698.00 MHz, 3944.50 MHz, 3955.50 MHz, and 4199.80 MHz in the downlink.

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<sup>1</sup> Intelsat has filed its STA request, 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 *Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-AMD-20190207-00008 (Jun. 21, 2019) (Public Notice).

<sup>3</sup> See *Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (Jun. 21, 2019) (Public Notice).

<sup>4</sup> Intelsat is also requesting 180 days of STA to support the MEV-1 mission.

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The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.<sup>5</sup> NGIS, at the direction of Intelsat, will follow industry practices for coordinating TT&C transmission during the reinsertion process and operations of the CVS at 27.5° W.L. will conform with all relevant coordination agreements.<sup>6</sup>

All operators of satellites in the LEOP or drift path 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 operations pursuant to this STA 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 attaches Exhibit A, which contains a coordination report. 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 request will allow Intelsat to help launch the MEV-1, safely dock the MEV-1 satellite to the Intelsat 901 satellite, reinsert the CVS into the geostationary arc, and provide continuity of service at 27.5° W.L. This request thereby promotes the public interest.

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  
Stephen Duall

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<sup>5</sup> Northrup Grumman Innovation Systems, Inc. (“NGIS”), the manager of the MEV-1 mission, will handle the coordination.

<sup>6</sup> Intelsat and NGIS have coordinated the operation of Intelsat 901 and MEV-1 as a CVS at the 27.5° W.L. orbital location.