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November 4, 2019

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

Re: Request for Extension of Special Temporary Authority
Riverside, California Earth Station E040125

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 Riverside, California C-band earth station (Call Sign E040125) to continue to provide launch and early orbit phase (“LEOP”) services and telemetry, tracking, and command (“TT&C”) services for MEV-1 (Call Sign S2990).³ MEV-1 was launched on October 9, 2019.

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)⁴ at 300 km above the geostationary arc; and (3) the drift as a combined vehicle stack (“CVS”) with IntelSat 901 from 300 km above the geostationary arc to 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.⁵

¹ 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”).

² See *Satellite Communications Services Information, Actions Taken*, Report No. SES-02208, File No. SES-STA-20190904-01200 (Oct. 16, 2019) (Public Notice).

³ See *Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-AMD-20190207-00008 (Jun. 21, 2019) (Public Notice).

⁴ See *Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (Jun. 21, 2019) (Public Notice).

⁵ IntelSat is also requesting 180 days of STA to support the MEV-1 mission. See *Satellite Communications Services, Satellite Radio Applications Accepted for Filing*, Report No. SES-02210, File No. SES-STA-20190904-01179 (Oct. 23, 2019) (Public Notice).

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The MEV-1 LEOP and TT&C operations will continue to 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.

The LEOP operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁶ NGIS, at the direction of Intelsat, will follow industry practices for coordinating TT&C transmission during the reinsertion process.

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 incorporates by reference Exhibit A of its original request,⁷ 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 extension request will allow Intelsat to help launch 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

⁶ Northrup Grumman Innovation Systems, Inc. (“NGIS”), the manager of the MEV-1 mission, will handle the coordination.

⁷ *See supra* n. 2.