

November 12, 2019

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

Re: Request for Special Temporary Authority

Riverside, California Earth Station E170039

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days, commencing November 22, 2019, to use its Riverside, California earth station (Call Sign E170039) to provide launch and early orbit phase ("LEOP") services for the TIBA-1 satellite, which is expected to launch on November 22, 2019.² Intelsat expects to provide LEOP services to the satellite for approximately 5 days.³

The LEOP operations will be performed at the following frequencies: 19.70 GHz and 19.698 GHz in the downlink; and 29.5 GHz and 29.498 GHz in the uplink. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP 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.

The 24x7 contact information for the TIBA-1 mission 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.

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 The in-orbit testing and final location for the TIBA-1 satellite, which Intelsat understands is licensed by Egypt, will be 33.5° E.L.

³ Intelsat is seeking 30-days of STA to accommodate the possibility of a launch delay.

⁴ Airbus, the manager of the TIBA-1 mission, will handle the coordination.

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In further support of this request, Intelsat herewith attaches Exhibit A, which contains waiver requests. 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.

Intelsat clarifies that during the TIBA-1 LEOP mission Airbus will serve as the mission manager. Airbus will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to Airbus. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to help launch the TIBA-1 satellite and safely insert it into the geostationary arc. This will help provide services at the 33.5° E.L. location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this STA 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