

December 11, 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 E040125

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing December 31, 2019, to use its Riverside, California C-band earth station (Call Sign E040125) to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 901 (Call Sign S2405)<sup>2</sup> prior to, during, and after its docking mission with MEV-1 (Call Sign S2990).<sup>3</sup>

Subject to Federal Communications Commission approval, Intelsat will provide TT&C services to Intelsat 901 during (1) the spacecraft’s orbit raising to 300 km above geostationary arc;<sup>4</sup> (2) the spacecraft’s docking with MEV-1 at 300 km above the geostationary arc; and (3) the drift as a combined vehicle stack (“CVS”) with MEV-1 from 300 km above the geostationary arc to 27.5° W.L.<sup>5</sup> Intelsat expects the orbit raising, drift, and docking to last approximately 9 weeks and reinsertion to last approximately 45 days. The orbit raising of Intelsat 901 began December 9, 2019.

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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-MOD-20190207-00009 (Jun. 21, 2019) (Public Notice).

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

<sup>4</sup> Once 300 km above geostationary orbit, the spacecraft will drift West until it rendezvouses with MEV-1. The rendezvouses is expected to occur at approximately 220° E.L.

<sup>5</sup> While docked with MEV-1, Intelsat 901 will use TT&C for health and telemetry monitoring; Intelsat 901’s TT&C will not be used for maneuvers while docked to MEV-1.

The Intelsat 901 TT&C operations will be performed at the following frequencies: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (space-to-Earth); and 6173.7 MHz and 6176.3 MHz (Earth-to-space).

Intelsat will follow industry practices for coordinating TT&C transmission during the orbit raising, docking, and reinsertion process.

All operators of satellites in the 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 Luis DeSilva or Michael Ryan.

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 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