

March 12, 2020

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Request for Special Temporary Authority

Riverside, California Earth Station E170039

Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an expedited 30 days of Special Temporary Authority ("STA"), commencing March 16, 2020, to use its Riverside, California Ka-band earth station (Call Sign E170039) to provide telemetry, tracking, and command ("TT&C") services for Spaceway-2² (Call Sign S2133) during the satellite's drift from 99.075° W.L. to 138.9° W.L.³ Spaceway-2 will commence its drift on March 16, 2020. Intelsat expects to provide TT&C drift services for approximately 30 days.

Spaceway-2 TT&C operations will be performed in the following frequencies:

- 29503.9063 MHz and 29511.7189 MHz in the uplink; and
- 19701.75 MHz and 19702.75 MHz in the downlink.

The drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift 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. 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.

The 24x7 contact information for the Spaceway-2 TT&C operations is as follows:

¹ 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.

² Policy Branch Information; Actions Taken, Report No. SAT-01062, File No. SAT-MOD-20141029-00116 (Jan. 9, 2015) (Public Notice).

³ See, e.g., Request for Special Temporary Authority to drift Spaceway-2 to, and operate at, 138.9° W.L., File No. SAT-STA-20200221-00018, (filed Feb. 21, 2020).

⁴ AT&T will handle the coordination.

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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.

Grant of this STA request will allow Intelsat to help the operator of Spaceway-2 safely redeploy the satellite. This, in turn, will help ensure safe space operations and thereby promotes the public interest.

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