



April 9, 2020

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

**Re: Request for Extension of Special Temporary Authority  
Riverside, California Earth Station E170039**

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")<sup>1</sup> previously granted to Intelsat<sup>2</sup> to use its Riverside, California Ka-band earth station (Call Sign E170039) to provide telemetry, tracking, and command ("TT&C") services for Spaceway-2<sup>3</sup> (Call Sign S2133) during the satellite's drift from 99.075° W.L. to 138.9° W.L.<sup>4</sup> Spaceway-2 began drifting on March 16, 2020. Intelsat expects to provide TT&C drift services for an additional 30 days.

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

- 29503.9063 MHz and 29511.7188 MHz in the uplink; and
- 19701.75 MHz and 19702.75 MHz in the downlink.

The drift operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.<sup>5</sup> All operators of satellites in that path have been 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.

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<sup>1</sup> 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.

<sup>2</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02250, File No. SES-STA-20200312-00237 (Mar. 18, 2020) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01062, File No. SAT-MOD-20141029-00116 (Jan. 9, 2015) (Public Notice).

<sup>4</sup> See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01452, File No. SAT-STA-20200221-00018 (Mar. 13, 2020) (Public Notice).

<sup>5</sup> AT&T will handle the coordination.

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The 24x7 contact information for the Spaceway-2 TT&C operations 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.

Grant of this STA extension 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 STA extension 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