



January 29, 2021

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: Request for Special Temporary Authority to Operate New Ku-band Earth Station in Motion Antennas**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 60 days, commencing February 22, 2021, to utilize 30 0.23 m airplane-mounted Earth Station in Motion (ESIM) Ku-band antennas (collectively, the “ESIM Antennas”) within the United States and its territories to communicate with Intelsat satellites and Hispasat 143W-1 (S3058) in order to test antenna performance and provide customer service.<sup>2</sup> The ESIM Antennas will operate during flight and on the tarmac. Intelsat will be seeking permanent authority to use these antennas.

The proposed operations will be performed in the following frequency bands: 14.0-14.5 GHz in the uplink; and 10.7-12.2 GHz in the downlink. The ESIM Antennas have a transmit gain of 30.4 dB at 14.25 GHz and a receive gain of 28.9 dB at 11.75 GHz. The total EIRP for all carriers will be 43.2 dBW with a maximum EIRP density of 7.2 dBW/4KHz.

The 24x7 contact information for the requested operations is as follows:

Intelsat Secure Operational Center  
Phone: +1 404-381-2727  
Email: ISOC@intelsatgeneral.com  
Primary Point of Contact:  
Angela Wheeler, Manager, Network Operations  
Phone: +1 404-381-2727  
Email: Angela.Wheeler@IntelsatGeneral.com

<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> The satellite an individual antenna communicates with is dependent on the antenna location and satellite availability during the communication and will vary over time. Therefore, in order to support customer service on the ESIM Antennas, Intelsat is seeking to communicate with its U.S.-licensed fleet of satellites and Intelsat satellites with market access. The proposed operations will be consistent with all applicable coordination agreements.

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In further support of this request, Intelsat attaches Exhibits A and B, which contain technical information supporting the proposed operations and a Radiation Hazard Report. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its ESIM Antennas, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this STA request will serve the public interest by enabling Intelsat to complete the testing of the ESIM Antennas and provide new customer service.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady  
Assistant General Counsel  
Intelsat US LLC

cc: Paul Blais