

June 15, 2021

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

**Re: Request for 180-day Grant of Special Temporary Authority
7.3m S-band Antenna, Haleiwa, Hawaii**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests a grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to use a 7.3m S-band antenna located at its Haleiwa, Hawaii teleport to provide telemetry, tracking, and command (“TT&C”) services to a U.S. Air Force Research Laboratory (“AFRL”) ASCENT CubeSat during its launch and early orbit phase and mission. ASCENT is scheduled to launch on June 22, 2021, and the TT&C services are expected to last approximately one year. Intelsat has filed a related 30-day STA request to support these services.²

The ASCENT CubeSat is a Department of Defense Space Test Program satellite that will demonstrate a new ASCENT propellant. Over the course of a year the satellite will transit to 300 km above geostationary orbit.

The TT&C operations will be performed using the following frequencies: 2037.5 MHz (RHCP) in the uplink and 2233.0 MHz (RHCP) in the downlink.

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

Ph.: (703) 559-7701 – East Coast Operations Center (primary)
(310) 525-5591 – West Coast Operations Center (back-up)

In further support of this request, Intelsat attaches Exhibits A and B, which contains technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating commercial terrestrial facility, and a U.S. Air Force/AFRL document supporting the requested ASCENT CubeSat operations, respectively.

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 See Intelsat’s Request for Special Temporary Authority to use Haleiwa, Hawaii 7.3m S-band antenna to provide TT&C for ASCENT, File No. SES-STA-20210607-00919 (filed June 7, 2021).

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To the extent necessary, Intelsat seeks waiver of the U.S. Table of Frequency Allocations, which allocates the commercial use 2025-2110 MHz to the fixed and mobile services, and the use of 2200-2290 MHz solely to Federal services.

The Federal Communications Commission (“Commission”) may grant a waiver for good cause shown. The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest. In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest. As shown below, good cause exists here to grant a waiver allowing Intelsat’s 7.3m S-band antenna to operate in order to support the ASCENT CubeSat mission.

Good cause exists to waive the Table of Allocations for 2025-2110 MHz and 2200-2290 MHz frequency bands. While the commercial allocation in both bands does not include any satellite services, the Federal allocation includes space operation in both bands. Therefore, Intelsat’s operations pursuant to grant of this STA will be consistent with the Federal allocations while supporting the Federal operator of the ASCENT CubeSat and will not increase the risk of interference.

Finally, Intelsat clarifies that during the ASCENT CubeSat mission, the U.S. Air Force will control the spacecraft. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to assist in ensuring the safe launch and flight of the ASCENT CubeSat satellite and thereby promotes the public interest.

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

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Paul Blais