May 18, 2022

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

Re: Request for Special Temporary Authority
Andover, Maine Earth Station E220058

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),[1] commencing June 15, 2022, to use its Andover, Maine C-band earth station, Call Sign E220058, to perform antenna verification testing. The antenna will communicate with Intelsat 23 (S2831) and Intelsat 34 (S2915) in order to verify the antenna performance in advance of commercial operations.[2]

The proposed testing will be performed at 3700-4200 MHz (downlink) and 5850-6425 MHz (uplink). The proposed operations will be consistent with Intelsat's relevant coordination agreements.[3]

The 24x7 contact information for the proposed testing is: Mark Ratcliff at +1 404-381-2839.

In support of this request, Intelsat herewith attaches Exhibits B and C, which contain coordination and radiation hazard reports. Operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. 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.

[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] Intelsat has a pending application for authorization for this antenna on a permanent basis, as expressly authorized by C-Band Order. *See* Intelsat License LLC, Application for new earth station in Andover, Maine AND-C38, File No. SES-LIC-20220511-00473 (filed May 11, 2022); *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 85 Fed. Reg. 22804, ¶ 375 (Apr. 23, 2020) ("*C-band Order*").

[3] In support of this request, additional antenna information is provided in Exhibit A.

In February 2020, the Federal Communications Commission ("Commission") adopted the *C-Band Order*, which requires all incumbent C-band satellite operators to consolidate their telemetry, tracking, and command ("TT&C") operations within CONUS into four protected locations prior to December 5, 2021.[4] Consistent with this Order, Intelsat submits this request as part of the buildout for its Andover, Maine teleport, which is one of the identified consolidated, protected teleports.[5] Grant of this STA request will allow Intelsat to ensure its C-band antenna is available for service, which will further of the Commission's objectives in the *C-Band Order* by helping to ensure the successful and timely consolidation of Intelsat's C-band TT&C operations.[6] Grant of this request thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request.

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: Kerry Murray

[4] *C-band Order* at, ¶ 375.

[5] *See* Letter from Michelle V. Bryan, Executive Vice President, General Counsel and Chief Administrative Officer, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 18-122 and 20-173, at 20-25 (Aug. 14, 2020) ("*Final Transition Plan*").

[6] Prior to adopting the *C-band Order*, the Commission issued a Public Notice temporarily freezing applications for new or modified earth station in the 3700-4200 MHz band. *See Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Station and Fixed Microwave Stations in the 3.7-4.2 GHz Band*; 90-day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band, Public Notice, GN Docket Nos. 17-183, 18-122, DA 18-398 (Apr. 19, 2018) ("*C-band Freeze*"). Intelsat believes that STAs are outside of the scope of *C-band Freeze*, but out of an abundance of caution and to the extent necessary, Intelsat seeks waiver of the temporary freeze in order to perform antenna verification testing of this antenna located at its protected Andover, Maine teleport. The Commission may grant a waiver for good cause shown and is appropriate where the particular facts make strict compliance inconsistent with the public interest. 47 C.F.R. § 1.3, *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). As outlined above, good cause exists to waive the *C-band Freeze* in the instant case.

EXHIBIT A

Antenna

Antenna size	13.1m		
Transmit Frequencies	5850-6725 MHz	5850-6425 MHz	5850-5860 MHz 5925-5935 MHz 6170-6180 MHz 6415-6425 MHz
Receive Frequencies	3700-4200 MHz		
Emission Designators	64K0G7W	72M0G7W	1M00F2D 1M00F7D 1M00F9D
Polarization	Linear and Circular		
Bandwidth	51.34 MHz	81.85 MHz	83 MHz
Transmit Gain	56.6 dB @ 6.250 GHz		
Maximum EIRP per Carrier	65.9 dBW/MHz	86.0 dBW/MHz	86.0 dBW/MHz
Maximum EIRP Density per Carrier	53.9 dBW/4 kHz	43.4 dBW/4KHz	62.0 dBW/4 KHz
Location	70° 41' 59.3" W		
	44° 37' 57" N		

Point(s) of Communication

Satellite	Intelsat 23	Intelsat 34
Call Sign	S2831	S2915
Satellite Type	Geostationary	Geostationary
Orbital Location	53°W	55.5°W