

March 24, 2023

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

Re: Request for Extension of Special Temporary Authority to Operate a Ball 9x9
Ku-band ESIM Terminal with Geostationary Orbit System Satellites

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat to operate a Ball 9x9 0.46m Ku-band earth station in motion ("ESIM") terminal with geostationary orbit ("GSO") system satellites for aeronautical testing and demonstrations.² The requested operations will occur while the aircraft is on the tarmac at Fort Worth Alliance Airport (AFW) in Fort Worth, TX and the San Juan Airport (SJU) in San Juan, Puerto Rico, and also while the aircraft is in flight. Inflight testing will occur over the continental United States, Puerto Rico and U.S. territories in the greater Caribbean area, and international waters. Testing will not occur over foreign territories or waters. Intelsat expects the operations to occur for an additional 60 days.

Intelsat requests continued authority to operate the ESIM terminal in the following frequency bands: 11700-12200 MHz (downlink) and 14000-14500 MHz (uplink) to communicate with the following satellites: Galaxy 11, Galaxy 17, Galaxy 18, Galaxy 33, Intelsat 32e/SKY-B1, Intelsat 37e, SES 6, SES 10, and DIRECTV T11. In support of this request, Intelsat incorporates by reference additional technical information, off-axis EIRP spectral density plots, and a Radiation Hazard Report that were included in its original request.³

The 24x7 contact information for the operations is: Angela Wheeler, Director, Network Operations Center, at (404) 381-2820 or angela.wheeler@intelsat.com.

In the extremely unlikely event that harmful interference should occur due to transmissions to or from its antenna, Intelsat will take all reasonable steps to eliminate the interference.

¹ Intelsat has filed its STA request, FCC Form 159, a \$220.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System.

² See, e.g., *Satellite Communications Services Information; Actions Taken*, Report No. SES-02546, File No. SES-STA-20230131-00107 (Mar. 1, 2023) (Public Notice). The aeronautical operations conform with the coordination agreement between Intelsat and National Aeronautics and Space Administration.

³ See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02532, File No. SES-STA-20221214-01341, Exhibit A-C (Jan. 11, 2023) (Public Notice).

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The requested operations will enable Intelsat to continue testing new equipment. Accordingly, grant of this request is in the public interest.

Respectfully submitted,

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

cc: Franco Hinojosa