



July 15, 2022

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

**Re: AT&T Services Inc. Application for Experimental License
ELS File No. 0334-EX-CN-2022**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), pursuant to the Federal Communications Commission’s (the “Commission”) rules,¹ submits these brief comments regarding the above-referenced application filed by AT&T Services Inc. (“AT&T”).

In its application, AT&T requests experimental authorization to test wireless communication systems in several spectrum bands, including the 5925-8400 MHz and 10700-12750 MHz bands.² As the Commission is aware, these large bands include a significant amount of spectrum allocated on a primary basis for space-to-Earth satellite communication services.³ Further, Intelsat holds several business-critical FSS authorizations in these bands that could be impacted by the proposed operations.⁴

Accordingly, Intelsat requests that, in addition to being on a non-interference basis by rule,⁵ AT&T’s operations under an experimental license be appropriately conditioned to require the completion of coordination with all potentially affected licensees prior to the commencement of operations.

¹ 47 C.F.R. §§ 5.55, 5.95.

² See AT&T Services Inc., Application for Experimental License, ELS File No. 0334-EX-CN-2022, 1 (filed Apr. 1, 2022).

³ The 10700-11700 MHz band is allocated to FSS and Fixed service on a co-primary basis and the 11700-12200 MHz band is allocated to FSS on a primary basis. See 47 C.F.R. § 2.106.

⁴ See, e.g., IBFS File No. SAT-LOA-20090410-00043 (granted Nov. 25, 2009); IBFS File No. SAT-LOA-20160915-00089 (granted June 8, 2017); IBFS File No. SAT-LOA-20210107-00004 (granted Feb. 28, 2022).

⁵ See 47 C.F.R. § 5.84.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/

W. Ray Rutngamlug
Associate General Counsel

Cynthia J. Grady
Assistant General Counsel

Intelsat US LLC