



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL ENVIRONMENTAL SATELLITE, DATA,
AND INFORMATION SERVICE

October 4, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Applicant: Intelsat US LLC
Station Location/Service: Space 137° W. L., Fixed Satellite Service
File No.: SAT-MOD-20180501-00036
Re: Application to Modify Authorization for Intelsat 5 (S2704),
Accepted for Filing September 7, 2018
Section 1.65 Notice, dated September 25, 2018

Dear Ms. Dortch:

In accordance with 47 C.F.R. § 25.154(a), the National Oceanic and Atmospheric Administration, U.S. Department of Commerce (NOAA) requests that the FCC delay any final action on the above-referenced Application for 60 days, for the reasons noted below and acknowledged separately by the Applicant in their letter to the FCC on September 25, 2018.

The current Application, as written, would result in overlapping station-keeping volumes between Intelsat-5 and NOAA's GOES-17 satellite. While there is no overlap of radio spectrum between the two satellites, NOAA seeks to avoid sharing the same physical location to minimize the potential for physical conjunction between space stations. GOES-17 is currently completing final checkouts from orbit after its launch on March 1, 2018, and will drift to 137° W. L. in November 2018 in accordance with the GOES-West-4(137) filing that was coordinated on April 29, 2014 at the ITU.

NOAA's satellite operations at 137° W. L. will be used for the operational GOES-West position, providing critical support to weather prediction and forecasting for the Pacific region and western United States, to include Alaska, Hawaii and the corresponding hemisphere. Due to the nature of NOAA image production, NOAA is unable to move very far from this precise location. To avoid complex station keeping coordination between operators, however, NOAA prefers a longitude offset strategy rather than a co-location at the same longitude.

NOAA and Intelsat are engaged in productive discussions to resolve this issue, so NOAA requests a suitable extension (60 days) before the FCC acts on this FSS license request, to ensure that any solution agreed to by NOAA and Intelsat can be submitted to the FCC as an amended application and reflected in any approved FCC authorization, as appropriate.

Sincerely,



Mark Paese
Deputy Assistant Administrator
For Satellite and Information Services
National Oceanic and Atmospheric Administration
U.S. Department of Commerce

CC: Intelsat License LLC
c/o Intelsat Corporation
Attention: Cynthia Grady
7900 Tysons One Place
McLean, VA 22102

