

March 14, 2011

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



Re: Request for Special Temporary Authority for Galaxy 26
Call Sign: S2469

Dear Ms. Dortch:

Intelsat License LLC (f/k/a Intelsat North America LLC) ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 60 days beginning April 15, 2011 to drift Galaxy 26 from 50.75° E.L. to 50.0° E.L., where the satellite will operate in the C- and Ku-bands pursuant to the ITU filings of the Turkish Administration for that location.² Intelsat plans shortly to file an application to modify the license for permanent operation at that location.

Intelsat expects to have Galaxy 26 at 50.0° E.L. within a few days of beginning the drift. During the drift, Intelsat will continue operating the satellite's Ku-band communications frequencies, as well as the satellite's TT&C frequencies. The operation of the satellite's Ku-band communications frequencies during the drift is being done to ensure continuity of service to two U.S. Government customers on the satellite that cannot be accommodated on another Intelsat satellite. Intelsat confirms that the only satellite between 50.75° and 50.0° E.L. that operates a Ku-band communications payload is Intelsat 26, which operates at 50.3° E.L. on frequencies that overlap with those of Galaxy 26 in the uplink (14.0-14.5 GHz). Intelsat will internally coordinate the drift of Galaxy 26 to ensure that customers on either satellite are not negatively impacted. The specific TT&C frequencies are as follows:

Primary command: 5926.5 MHz (RHCP) (uplink)
Back-up command: 6411 MHz (RHCP) (uplink)
Telemetry: 4196.5 MHz (V) or 4199.5 MHz (V)
Ranging: 6315 MHz (V) (uplink)
4090 MHz (H) (downlink)

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² Although Turkey's ITU filings currently do not contain the frequency band 11700-12200 MHz, Intelsat intends to ask Turkey to file for the band.

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Intelsat requests that the waiver of Section 25.202(g) previously granted Intelsat for Galaxy 26 at 50.75° E.L. continue to apply at 50.0° E.L. At the 50.0° E.L. location, Intelsat will comply with the condition previously imposed on its operation of Galaxy 26's TT&C operations at 50.75° E.L.³

The specific communications payload frequencies are as follows, although, as noted above, only the Ku-band communications frequencies will be operated during the drift:

5925-6425 MHz (uplink)
3700-4200 MHz (downlink)
14000-14500 MHz (uplink)
11700-12200 MHz (downlink)⁴

Grant of this STA request is in the public interest because it will allow Intelsat to continue to provide U.S. Government customers with capacity in the Indian Ocean region without risk of harmful interference. The reason Galaxy 26 is moving from 50.75° E.L. to 50.0° E.L. is because of the impending launch of Yahsat-1A to 52.5° E.L.⁵ Once Yahsat-1A is on-station, it likely will interfere with the operations of Galaxy 26 at 50.75° E.L. Moving the latter to 50.0° E.L. prior to Yahsat-1A being brought into service will allow both satellites to operate without harmful interference. Customers on Galaxy 26 will not experience service degradation because they will be tracking the satellite during the drift.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will coordinate the drift with all potentially affected operators in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 50.0° E.L., Intelsat will operate Galaxy 26

³ See Policy Branch Information; Actions Taken, Report No. SAT-00613, File No. SAT-MOD-20090309-00034 (June 19, 2009) (Public Notice).

⁴ Intelsat will continue to comply with the conditions previously imposed on the operation of the Galaxy 26 satellite in the 11700-12200 MHz frequency band. *See id.*

⁵ Yahsat-1A currently is scheduled to be launched with Intelsat's New Dawn satellite on March 31, 2011. Yahsat-1A is a C-, Ku-, Ka-band satellite.

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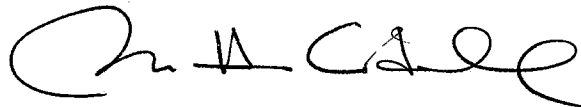
pursuant to the coordination agreements of the Turkish Administration for that location.⁶

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Galaxy 26 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.

Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 26 at 50.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 26 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Kathryn Medley
Stephen Duall

⁶ Intelsat expects shortly to reach an agreement with TurkSat authorizing Intelsat to operate a satellite at 50.0° E.L. and will file a copy of such agreement with the FCC.