

September 23, 2011

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



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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60-day extension – from October 8, 2011 through December 6, 2011 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted to Intelsat to drift Galaxy 26 from 50.75° E.L. to 50.0° E.L. and operate it at 50.0° E.L. in the C- and Ku-bands pursuant to the ITU filings of the Turkish Administration.<sup>2</sup> Intelsat also has a pending application to modify the Galaxy 26 license for permanent operation at that location.<sup>3</sup>

Grant of this STA further extension 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. As the Commission is aware, there is a shortage of available Ku-band capacity in the Middle East region.<sup>4</sup> Extending Intelsat's STA to operate Galaxy 26 at 50.0° E.L. helps fulfill critical spectrum needs in this region, thus serving the public interest.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00800, File No. SAT-STA-20110727-00137 (Aug. 12, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00787, File No. SAT-STA-201110314-00053 (June 17, 2011) (Public Notice). Although Turkey's ITU filings initially did not contain the frequency band 11700-12200 MHz, Turkey has since filed for the band.

<sup>3</sup> See *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00775, File Nos. SAT-MOD-20110420-00073 (May 6, 2011) (Public Notice).

<sup>4</sup> See GAO, *Competition, Capacity, and Costs in the Fixed Satellite Services Industry*, Report to Congressional Requesters at 12 (Sept. 2011), available at <http://www.gao.gov/new.items/d11777.pdf> ("GAO Report") (finding that there is less available satellite capacity in the Middle East and Africa than other regions, such as North and South America, Asia, and Western Europe).

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Grant of this STA further extension request will not result in increased risk of harmful interference. As explained in its initial STA request, the reason Galaxy 26 was moved from 50.75° E.L. to 50.0° E.L. was to mitigate interference with respect to the recently-launched Yahsat-1A satellite at 52.5° E.L.<sup>5</sup> As noted above, at 50.0° E.L., Intelsat will continue to operate Galaxy 26 pursuant to the coordination agreements of the Turkish Administration for that location.<sup>6</sup> Intelsat plans to seek a meeting with Al Yah Satellite Communications Company PrJSC (“Yahsat”), to be held in the United Arab Emirates as soon as possible, in order to continue discussing the coordination situation. In the meantime, operation of Galaxy 26 at 50.0° E.L. will continue to be conducted on a non-interference, non-protected basis with respect to Yahsat and any other operator of nearby co-frequency satellites. In addition, Intelsat agrees to accept the same conditions that were imposed in its existing STA to operate Galaxy 26 at 50.0° E.L.<sup>7</sup> These conditions ensure that Yahsat’s current and future operations on Yahsat-1A will not be negatively impacted by Galaxy 26’s continued operation – as they have not been to date.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Kathryn Medley  
Stephen Duall  
Jay Whaley  
John Janka, Counsel to YahSat  
Daniel Mah, SES

<sup>5</sup> Yahsat-1A was launched with Intelsat’s New Dawn satellite on April 22, 2011. Yahsat-1A is a C-, Ku-, Ka-band satellite.

<sup>6</sup> See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, Federal Communications Commission, File Nos. SAT-MOD-20110420-00073 and SAT-STA-20110314-00053 (June 8, 2011).

<sup>7</sup> See *supra* n.2.