

September 5, 2013

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



Re: Request for Special Temporary Authority to Drift Intelsat 16 to 79.0° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days, commencing no later than September 13, 2013, to drift Intelsat 16 (call sign S2750) from 58.1° W.L. to 79.0° W.L., where it will operate temporarily in the Ku-band.² During the drift to 79.0° W.L. (and once the satellite is on-station), Intelsat will operate the following TT&C frequencies: 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz. Intelsat seeks this STA in order to meet the temporary demands of its customer—SKY Mexico. For the reasons set forth below, grant of this STA request will not create any gap in service at the nominal 58.0° W.L. orbital location.

Intelsat currently operates Intelsat 16 at 58.1° W.L.,³ where it is collocated with Intelsat 21. At 58.1° W.L., Intelsat 16 serves as an in-orbit spare. Intelsat expects Intelsat 16 to operate at 79.0° W.L. for no longer than the 180-day period requested in the companion STA request filed herewith.

Intelsat will operate Intelsat 16 at 79.0° W.L. on a non-interference/non-protected basis. As the Commission is aware, DIRECTV Enterprises, LLC ("DIRECTV") currently holds the license to operate in Ku-band at 79.0° W.L. ("DIRECTV KU-79W License").⁴ DIRECTV fully supports this request to allow Intelsat 16 temporarily to operate at 79.0° W.L. for the benefit of its affiliate, SKY Mexico.

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

² Intelsat seeks only drift authority herein. Intelsat concurrently is filing a 180-day STA request to both drift the satellite and operate it once on station at 79.0° W.L.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice).

⁴ See *Application of DIRECTV Enterprises, LLC*, File Nos. SAT-LOA-20120316-00051 and SAT-AMD-20120420-00071 (stamp grant issued July 12, 2012).

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The Intelsat 16 drift is expected to take approximately 53 days and Intelsat expects the satellite to be on-station at 79.0° W.L. by early November 2013. The drift will be coordinated with all operators of co-frequency satellites in the drift path. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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. Intelsat 16 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, with the exception of the DIRECTV KU-79 License, 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 Intelsat 16 at 79.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 16 at 79.0° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 16 at 79.0° W.L. will help satisfy customer demand at that location. As noted above, grant of this STA request will not create any gap in service at the nominal 58.0° W.L. orbital location. Accordingly, grant of this STA request is in the public interest.

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers