

October 21, 2013

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



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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day extension -- from October 12, 2013 through November 10, 2013 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat 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 continued 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 extension in order to meet the temporary demands of its customer—SKY Mexico. For the reasons set forth below, grant of this STA extension request will not create any gap in service at the nominal 58.0° W.L. orbital location.

Intelsat 16 is currently drifting toward 79.0° W.L. and is expected to arrive on-station in early November. Intelsat expects Intelsat 16 to operate at 79.0° W.L. for no longer than the 180-day period requested in its pending companion STA request to both drift the satellite and operate it once on station at 79.0° W.L.³

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.

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00972, File No. SAT-STA-20130905-00011 (Sept. 13, 2013) (Public Notice).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00971, File No. SAT-STA-20130905-00012 (Sept. 13, 2013) (Public Notice).

(“DIRECTVKU-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.

The drift of Intelsat 16 will continue to 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 DIRECTVKU-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. Moreover, grant of this STA extension request will not create any gap in service at the nominal 58.0° W.L. orbital location because Intelsat 16 had served there as an in-orbit spare, collocated with Intelsat 21. Accordingly, grant of this STA extension request is in the public interest.

⁴See *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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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: Stephen Duall
Jay Whaley
Cindy Spiers