

January 23, 2014

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



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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 30 days—from March 16, 2014 through April 15, 2014—to continue operating in the 11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 (Earth-to-space) frequency bands, and providing telemetry, tracking and telecommand (“TT&C”) operations using the 4196.5 MHz (vertical polarization/space-to-Earth) or 4199.5 MHz (vertical polarization/space-to-Earth); 6315.0 MHz (vertical polarization/Earth-to-space) and 4090.0 MHz (horizontal polarization/space-to-Earth); 5926.5 (right-hand circular polarization/Earth-to-space), and 6411.0 MHz (right-hand circular polarization/Earth-to-space) frequencies, on the Galaxy 26 satellite (call sign S2469) at the 50.0° E.L. orbital location.

Intelsat is currently authorized to operate the Galaxy 26 satellite at the 50.0° E.L. orbital location in the C- and Ku-bands through the license term for the Galaxy 26 satellite, which expires on March 15, 2014.<sup>2</sup> Although Condition 8 of that authorization limited the duration of Galaxy 26’s operations in the 11.7-12.2 GHz frequency band to December 31, 2013,<sup>3</sup> the Commission subsequently granted Intelsat an STA to extend operations in the 11.7-12.2 GHz frequency band through the expiration of Galaxy 26’s license term on March 15, 2014.<sup>4</sup>

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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 *Intelsat License LLC, Application to Modify Authorization to Relocate Galaxy 26 to 50.0° E.L.*, File No. SAT-MOD-20110420-00073, Condition 9 (filed Apr. 20, 2011; stamp grant, Mar. 2, 2012).

<sup>3</sup> See *id.*, Condition 8.

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report. No. SAT-00988, File No. SAT-STA-20131107-00129 (Dec. 27, 2013) (Public Notice).

Intelsat had planned to de-orbit Galaxy 26 at the end of its license term. Prior to de-orbit, the U.S. Government customers currently served by Galaxy 26 were scheduled to move to the ABS-2 satellite (a/k/a ST-3 and Koreasat-8), which originally had been scheduled to launch in January 2014. Intelsat recently has learned, however, that the ABS-2 satellite launch has been delayed until approximately February 6, 2014. As a result of this delay, absent the Commission granting this STA request, the U.S. Government customers would experience service interruption upon the expiration of the Galaxy 26 license term on March 15, 2014 until the ABS-2 satellite becomes fully operational a short time thereafter.<sup>5</sup> Consequently, Intelsat herein requests that the Commission authorize Intelsat temporarily to continue operating the Galaxy 26 satellite in the aforementioned frequency bands at 50.0° E.L. until April 15, 2014 to ensure continuity of service.

Intelsat will continue operating Galaxy 26 at the 50.0° E.L. orbital location pursuant to the technical parameters provided in its current authorization and incorporates this information by reference.<sup>6</sup> Intelsat requests that the waiver of Section 25.202(g) previously granted Intelsat for Galaxy 26 at 50.0° E.L. continue to apply. Intelsat will continue to comply with the condition previously imposed on Galaxy 26's TT&C operations.<sup>7</sup> At the conclusion of this STA on April 15, 2014, Intelsat plans to de-orbit the satellite as previously approved by the Commission.<sup>8</sup>

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 until they can be transferred to ABS-2. Grant of this STA request will not result in risk of harmful interference as Intelsat will continue to operate

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<sup>5</sup> Assuming a February 6 launch, Intelsat expects to transfer the U.S. Government customers to ABS-2 by the end of March. Intelsat has requested temporary operational authority through mid-April to accommodate possible slippage in the launch and/or traffic transfer schedule.

<sup>6</sup> *See supra* note 2.

<sup>7</sup> *See id.*, Condition 4.

<sup>8</sup> *See Intelsat License LLC, Application to Modify Authorization to Relocate Galaxy 26 to 50.0° E.L.*, File No. SAT-MOD-20110420-00073 (filed Apr. 20, 2011), Engineering Statement at 6-7. Intelsat confirmed that it expects to dispose of the spacecraft by moving it to a planned minimum altitude of 150 kilometers (perigee) above the geostationary arc. Intelsat has reserved 63.5 kilograms of fuel for this purpose. The fuel gauging uncertainty has been taken into account in these calculations.

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Galaxy 26 pursuant to the coordination agreements of the Turkish Administration for that location.<sup>9</sup>

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

Sincerely,



Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Kathyrn Medley  
Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>9</sup> Intelsat previously filed a letter from Türksat Satellite Communication Cable TV and Operation Inc. confirming Intelsat's authority to operate a satellite at 50.0° E.L. pursuant to ITU filings of the Government of Turkey. *See Supplement to Application to Modify Authorization to Relocate Galaxy 26 to 50.0° E.L.*, File No. SAT-MOD-20110420-00073 (filed June 8, 2011).