

February 12, 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  
**EXPEDITED TREATMENT REQUESTED**

Dear Ms. Dortch:

Intelsat License LLC herein requests Special Temporary Authority ("STA")<sup>1</sup> for 30 days beginning February 18, 2014 to drift Galaxy 26 from 50.0° E.L. to 49.9° E.L., where the satellite will continue to operate in the C- and Ku-bands pursuant to the ITU filings of the Turkish Administration for that location.<sup>2</sup> Intelsat requests expeditious treatment of this request because the operator of Turksat-4A has informed Intelsat that it intends to conduct in-orbit testing of that satellite at precisely 50.0° E.L. starting February 21, 2014.

Intelsat expects to have Galaxy 26 at 49.9° 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 U.S. Government customers on the satellite that are to be transferred to the ABS-2 satellite in the near future. Intelsat confirms that there are no co-frequency satellites between 50.0° E.L. and 49.9° E.L.

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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> Intelsat currently is authorized to operate the satellite at 50.0° E.L. through March 15, 2014. 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) and *Policy Branch Information; Actions Taken*, Report, No. SAT-00988, File No. SAT-STA-20131107-00129 (Dec. 27, 2013) (Public Notice). Although Intelsat had planned to de-orbit Galaxy 26 starting in March, Intelsat has requested STA to continue to operate the TT&C frequencies and Ku-band payload frequencies through April 15, 2014 in order to ensure that the customers have time to transition to a new satellite. See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20140123-00009 (filed Jan. 23, 2014).

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)

Intelsat requests that the waiver of Section 25.202(g) previously granted Intelsat for Galaxy 26 at 50.0° E.L. continue to apply at 49.9° E.L. At the 49.9° E.L. location, Intelsat will comply with the condition previously imposed on its operation of Galaxy 26's TT&C operations at 50.0° E.L.<sup>3</sup>

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

14000-14500 MHz (uplink)  
11700-12200 MHz (downlink)<sup>4</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 region without risk of harmful interference and to ensure safe station-keeping of Galaxy 26 upon the arrival of Turksat-4A. Moving the former temporarily to 49.9° E.L. prior to the arrival of Turksat-4A also will ensure that the latter's in-orbit testing will not experience 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, there are no potentially affected operators in the drift path. Once on-station at 49.9° E.L., Intelsat will continue to operate Galaxy 26 pursuant to the coordination agreements of the Turkish Administration for that location.

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

<sup>4</sup> 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.*

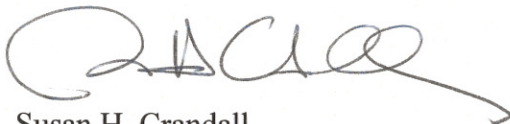
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Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Galaxy 26 will not be located at the same orbital location as another 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 49.9° 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,

A handwritten signature in black ink, appearing to read 'S. Crandall', with a long horizontal flourish extending to the right.

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Kathryn Medley  
Stephen Duall  
Jay Whaley  
Cindy Spiers