

March 10, 2013

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



Re: Request for Further Extension of Special Temporary Authority to Drift Galaxy 11 to, and Operate at, 55.6° W.L. (304.4° E.L.); Call Sign: S2253

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 180 days, commencing March 11, 2014, of the Special Temporary Authority previously granted Intelsat ("STA")<sup>1</sup> to drift Galaxy 11 (S2253) from 55.5° W.L. to 55.6° W.L. and operate the satellite temporarily at 55.6° W.L. prior to permanently relocating the satellite to 44.8° W.L.<sup>2</sup> Intelsat will continue to operate Galaxy 11 in the 13750 – 14500 MHz, 10950 – 11200 MHz and 11700 – 12200 MHz frequency bands and will provide TT&C using the 14000.5 MHz, 14498.5 MHz, 11701 MHz, and 11702 MHz frequencies. Due to an administrative oversight, Intelsat inadvertently utilized the wrong grant date of its current authorization in calculating the STA's end date and is filing this further extension request outside of the required three business days before expiration.<sup>3</sup>

Intelsat currently operates Galaxy 11 at 55.6° W.L. and Intelsat 805 at 55.5° W.L.<sup>4</sup> Intelsat 27, which was supposed to replace Intelsat 805, failed to launch successfully in March 2013. As such, Intelsat notified the

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

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00979, File No. SAT-STA-20130829-00019 (Nov. 8, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00934, File No. SAT-STA-20130102-0001 (Mar. 1, 2013) (Public Notice). Intelsat has a pending application to modify the license for Galaxy 11 to allow it to be redeployed to 44.8° W.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00918, File No. SAT-MOD-20121018-00184 (Dec. 14, 2012) (Public Notice).

<sup>3</sup> See 47 C.F.R. § 25.120(a). To the extent necessary, Intelsat respectfully requests a waiver of the three-business day requirement.

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00764, File No. SAT-MOD-20101102-00229 (Mar. 11, 2011) (Public Notice) and *Applications of Intelsat LLC for Authority to Operate and Further*

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Commission that Galaxy 11's redeployment to 44.8° W.L. would be delayed until the second half of 2015.<sup>5</sup>

Intelsat will continue to operate Galaxy 11 at 55.6° W.L. in accordance with Intelsat's coordination agreements concerning the nominal 55.5° W.L. location. The only co-frequency satellites located within plus or minus three degrees of 55.6° W.L. are Intelsat satellites.

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 11 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 11 at 55.6° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 11 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The continued operation of Galaxy 11 at 55.6° W.L. will help to ensure the safe station-keeping of the two Intelsat satellites at the nominal 55.5° W.L. location. Accordingly, grant of this STA extension request is in the public interest.

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*Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

<sup>5</sup> See Letter from Susan H. Crandall, Intelsat License LLC, to Ms. Marlene H. Dortch, FCC, File No. SAT-MOD-20121018-00184 (Mar. 14, 2013).

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

Sincerely,

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

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers