

April 30, 2014

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 Operate
Intelsat 16 at 79.0° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 120 days—from May 5, 2014 through September 1, 2014— of the Special Temporary Authority ("STA")¹ previously granted Intelsat to operate Intelsat 16 (S2750) temporarily at 79.0° W.L.² At 79.0°W.L., Intelsat will continue to operate the following TT&C frequencies: 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the following communications payload frequencies: 13750 – 14500 MHz and 11700 – 12200 MHz frequency bands.³ Intelsat seeks this STA extension to continue meeting the temporary demands of its customers – SKY Mexico and SKY Brazil. Intelsat currently expects to redeploy Intelsat 16 to a different location in August of this year, subject to receipt of FCC approval.

Intelsat will continue to 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. ("DIRECTVKU-79W License").⁴ DIRECTV fully supports this extension request to allow Intelsat 16 to continue operating temporarily at 79.0° W.L.

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

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-00979, File No. SAT-STA-20130905-00112 (Nov. 8, 2013) (Public Notice).

³ Although Intelsat 16 also includes the bands 12750-13250 MHz and 10700-11450 MHz, Intelsat is not seeking authority to operate in these bands in this request.

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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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 that has 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 continue to satisfy customer demand at that location. As noted above, grant of this STA extension request will not create any gap in service or leave licensed frequencies unused at the nominal 58.0° W.L. orbital location. Accordingly, grant of this STA extension request is in the public interest.

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 "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Associate General Counsel

Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers