

May 8, 2014

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



Re: Request for Special Temporary Authority to Drift Intelsat 16 to, and Operate at, 76.0° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days, commencing June 10, 2014, to drift Intelsat 16 (S2750) from 79.0° W.L. to 76.0° W.L. and to operate the satellite temporarily at 76.0° W.L.² During the drift to 76.0° 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. On-station at 76.0° W.L, Intelsat will operate Intelsat 16 in the 14000 – 14500 MHz and 11700 – 12200 MHz frequency bands.³ Intelsat seeks this STA in order to meet the temporary demands of its customers – SKY Mexico and SKY Brazil.

Intelsat currently operates Intelsat 16 at 79.0° W.L. pursuant to STA.⁴ Subject to receipt of FCC approval, Intelsat expects Intelsat 16 to be on-station at 76.0° W.L. by the end of June 2014.

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 Intelsat previously had filed a 180-day STA request seeking authority commencing August 10 to drift Intelsat 16 to, and operate it at, 76.0° W.L., before determining to start the drift earlier – on June 10, 2014. *See Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20140502-00046 (filed May 2, 2014). Intelsat requests that the FCC continue to process the 180-day STA request for longer-term operational authority at 76.0° W.L.

³ Although Intelsat 16 also includes the bands 12750-13250 MHz, 13750-14000 and 10700-11450 MHz, Intelsat is not seeking authority to operate in these bands in this request.

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00979, File No. SAT-STA-20130905-00112 (Nov. 8, 2013) (Public Notice); *See Intelsat License LLC Request for Extension of Special Temporary Authority to Operate Intelsat 16 at 79.0° W.L.*, Call Sign S2750, File No. SAT-STA-20140430-00043 (filed Apr. 30, 2014).

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Intelsat will operate Intelsat 16 at 76.0° 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 76.0° W.L. (“DIRECTV KU-76W License”).⁵ DIRECTV fully supports this request to allow Intelsat 16 temporarily to operate at 76.0° W.L.

The Intelsat 16 drift will 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 DIRECTV KU-76 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 76.0° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 16 at 76.0° 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 76.0° W.L. will help satisfy customer demand at that location. Grant of this STA request will not create any gap in service. Accordingly, grant of this STA request is in the public interest.

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00943, File No. SAT-LOA-20121101-00190 (Apr. 19, 2013).

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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", written in a cursive style.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers