

August 27, 2014

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

Re: Request for Special Temporary Authority to Operate Intelsat 16 at 79.0° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)<sup>1</sup> for 180 days, commencing immediately upon grant, to operate Intelsat 16 (S2750) at 79.0° W.L. in the TT&C frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 13750 – 14500 MHz and 11700 – 12200 MHz.<sup>2</sup> Intelsat seeks this STA in order to meet the temporary demands of its customers, SKY Mexico and SKY Brazil.

Intelsat 16 is currently authorized to operate temporarily at 76.0° W.L.<sup>3</sup> Intelsat is concurrently filing a 30-day STA request to drift Intelsat 16 to, and operate it at, 79.0° W.L. Intelsat expects the satellite to be on-station at 79.0° W.L. on or about October 24, 2014.

Intelsat will 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 78.8° W.L. (“DIRECTV KU-78.8W License”).<sup>4</sup> DIRECTV fully supports this request to allow Intelsat 16 temporarily to operate at 79.0° W.L.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$930.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> 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.

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01029, File No. SAT-STA-20140502-00046 (July 18, 2014) (Public Notice). Intelsat 16 is permanently licensed to operate at 58.0° W.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01002, File No. SAT-MOD-20130718-00096 (Mar. 14, 2014) (Public Notice).

Ms. Marlene H. Dortch  
August 27, 2014  
Page 2

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.

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.<sup>5</sup>

The temporary operation of Intelsat 16 at 79.0° W.L. will help satisfy customer demand at that location. Accordingly, grant of this STA request is in the public interest.

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: Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>5</sup> To the extent necessary, Intelsat and SKY Mexico will coordinate the station-keeping of Intelsat 16 and SkyMexico-1 following the latter satellite's launch.