

November 5, 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 Drift and Operate Intelsat 16 at 79.0° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from November 9, 2014 through December 8, 2014—of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Intelsat 16 (S2750) to, and operate at, 79.0° W.L.² Intelsat 16 currently is on station at 79.0° W.L. At that location, Intelsat 16 will continue operating in the following TT&C frequencies: 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as in the 13750 – 14500 MHz and 11700 – 12200 MHz communications frequency bands.³ Intelsat seeks this STA extension in order to continue meeting the temporary demands of its customers, SKY Mexico and SKY Brazil.⁴

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.⁵ DIRECTV fully supports this request to allow Intelsat 16 to operate 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 another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.

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

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01044, File No. SAT-STA-20140827-00095 (Oct. 3, 2014) (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 Intelsat additionally has a pending 180-day STA request to operate Intelsat 16 at 79.0° W.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01043, File No. SAT-STA-20140827-00096 (Oct. 3, 2014) (Public Notice).

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-01002, File No. SAT-MOD-20130718-00096 (Mar. 14, 2014) (Public Notice).

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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.⁶

The temporary operation of Intelsat 16 at 79.0° W.L. will help satisfy customer demand at that 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,



Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁶ 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.