

July 1, 2015

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 Conduct In-Orbit Testing of the Intelsat 34 Satellite;  
Call Sign S2915

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, from August 28, 2015 through September 26, 2015, to conduct in-orbit testing (“IOT”) of the Intelsat 34 satellite (Call Sign S2915) at 51.5° W.L. in the bands 3700 – 4200 MHz, 5925 – 6425 MHz, 11450 – 11700 MHz, 11700 – 12200 MHz, and 14000 – 14500 MHz; and to drift the satellite to its permanent location of 55.5° W.L.<sup>2</sup> Intelsat 34 currently is scheduled to be launched on August 18, 2015. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 34, Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat’s knowledge, the only co-frequency satellites within plus/minus six degrees of 51.5° W.L. are Intelsat 805 at 55.5° W.L., Galaxy 11 at 55.6° W.L., Intelsat 23 at 53.0° W.L., Intelsat 1R at 50.0° W.L., NSS 806 at 47.5° W.L., and Amazonas 1 at 55.5° W.L. Intelsat has completed coordination discussions with SES World Skies, the operator of NSS 806; and Hispasat, the operator of Amazonas 1, regarding the Intelsat 34 IOT. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. 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 collision with large debris or other operational space stations during IOT at 51.5° W.L. Intelsat 34 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 Intelsat 34 at 51.5° W.L. Finally, Intelsat is not aware of any

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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> See *Policy Branch Information; Actions Taken*, Report No. SAT-01064, File No. SAT-LOA-20140114-00005 (Jan. 23, 2015) (Public Notice). During the drift from 55.1° W.L. to 55.5° W.L., only the satellite’s TT&C frequencies will be utilized. The TT&C frequencies are: 3949 MHz, 3949.5 MHz, 3950.5 MHz, 3951 MHz (space-to-Earth); and 6173.7 MHz and 6176.3 MHz (Earth-to-space).

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system with an overlapping station-keeping volume with Intelsat 34 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 34's C- and Ku-band payloads at 51.5° W.L. is a critical step in ensuring that the satellite will be fully operational at 55.5° W.L. This, in turn, will ensure continuity of service to customers at the 55.5° W.L. location, and thereby promotes the public interest.

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

Sincerely,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive, flowing style.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers