

August 7, 2015

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

Re: Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 16 at 76.2° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from August 15, 2015 through September 13, 2015—of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 16 (S2750) to, and operate at, 76.2° 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 14000 – 14500 MHz and 11700 – 12200 MHz.<sup>2</sup> Intelsat seeks this STA extension in order to meet the temporary demands of its customers—SKY Mexico and SKY Brazil. Intelsat has a pending 180-day STA request to operate Intelsat 16 at 76.2° W.L.<sup>3</sup>

Intelsat 16 arrived on-station at 76.2° W.L. on August 2, 2015. Intelsat will continue to operate Intelsat 16 at 76.2° 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”).<sup>4</sup> DIRECTV fully supports this request to allow Intelsat 16 temporarily to operate at 76.2° 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

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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-01096, File No. SAT-STA-20150625-00039 (July 17, 2015) (Public Notice). Although Intelsat 16 also includes the bands 12750 – 13250 MHz, 10700 – 11450 MHz, and 13750 – 14000 MHz, Intelsat is not seeking authority to operate in these bands in this request except for the 13997.5 MHz frequency used for uplink TT&C, noted above.

<sup>3</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01095, File No. SAT-STA-20150625-00038 (July 17, 2015) (Public Notice). Intelsat 16 is currently licensed to operate at 79.0° W.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01078, File No. SAT-MOD-20150105-00003 (Apr. 17, 2015) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00943, File No. SAT-LOA-20121101-00190 (Apr. 19, 2013) (Public Notice).

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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-76W 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 76.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 16 at 76.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The continued temporary operation of Intelsat 16 at 76.2° 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 extension request.

Sincerely,



Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers