

September 21, 2015

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from September 27, 2015 through October 26, 2015—of the Special Temporary Authority (“STA”)¹ previously granted Intelsat 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.² Intelsat is only seeking to extend the drift portion of the previously granted STA, as Intelsat 34 was successfully launched on August 20, 2015 and completed IOT on September 17, 2015.³ In support of its extension request, Intelsat submits the following information.

During the drift of the Intelsat 34 satellite from 51.5° W.L. to 55.5° W.L., Intelsat will utilize only the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will follow industry practices for coordinating TT&C transmission during the relocation process. The specific 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).

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

The drift of Intelsat 34 to its final location is one of the final steps 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.

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-01100, File No. SAT-STA-20150701-00040 (July 31, 2015) (Public Notice).

³ Intelsat will file a notice regarding completion of Intelsat 34’s IOT within the time specified in 47 C.F.R. § 25.173.

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

Sincerely,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive style with a large initial "C" and a stylized "G".

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers