

September 25, 2015

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat 16 at 58.1° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 30 days—from November 4, 2015 through December 3, 2015—to drift Intelsat 16 (S2750) from 76.2° W.L. to 58.1° W.L. and operate the satellite at that location. Specifically, Intelsat seeks STA to operate the Intelsat 16 satellite in the TT&C frequencies 12198.25 MHz, 12198.75 MHz, 13997.5 MHz, and 14499.5 MHz during the drift and on-station at 58.1° W.L., as well as the communications frequencies 10700 – 11450 MHz, 11700 – 12200 MHz, 12750 – 13250 MHz, 13750 – 14000 MHz, and 14000 – 14500 MHz once Intelsat 16 has reached 58.1° W.L. Intelsat seeks this STA in order to meet the demands of its customers—SKY Mexico and SKY Brazil.

Intelsat 16 is licensed permanently to operate at 79.0° W.L.,² although, as noted above, the satellite is temporarily operating at 76.2° W.L.³ Intelsat is concurrently filing a 180-day STA request to operate Intelsat 16 at 58.1° W.L.⁴

The drift of Intelsat 16 to 58.1° W.L. is expected to take approximately ten weeks. Once on-station at 58.1° W.L., and until permanently authorized, Intelsat will operate Intelsat 16 on a non-interference/non-protected basis, nominally co-located with Intelsat 21 at 58.0° 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-01078, File No. SAT-MOD-20150105-00003 (Apr. 17, 2015) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01103, File No. SAT-STA-20150625-00038 (Aug. 21, 2015) (Public Notice).

⁴ Intelsat expects to file a permanent license modification application at a later date.

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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 16 at 58.1° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 16 at 58.1° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The operation of Intelsat 16 at 58.1° 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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers