

November 30, 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 Drift Intelsat 16 to 58.1° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from December 4, 2015 through January 2, 2016—of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Intelsat 16 (S2750) from 76.2° W.L. to 58.1° W.L.² Due to an unexpected delay, Intelsat 16 is now expected to begin drifting shortly. The drift of Intelsat 16 to 58.1° W.L. is expected to take approximately ten weeks.

Intelsat 16 is licensed permanently to operate at 79.0° W.L.,³ although, as noted above, the satellite is temporarily operating at 76.2° W.L.⁴ Intelsat currently has temporary authority to operate Intelsat 16 at 58.1° W.L. following its redeployment to that location.⁵

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.

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°

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-01114, File No. SAT-STA-20150925-00066 (Oct. 23, 2015) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01078, File No. SAT-MOD-20150105-00003 (Apr. 17, 2015) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01103, File No. SAT-STA-20150625-00038 (Aug. 21, 2015) (Public Notice).

⁵ See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20150925-00067 (stamp grant issued Nov. 25, 2015 by Stephen J. Duall). Intelsat expects to file a permanent license modification application at a later date.

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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 extension 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', with a long horizontal flourish extending to the right.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers