

December 11, 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 29e Satellite; Call Sign S2913

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 60 days, from February 8, 2016 through April 7, 2016, to conduct in-orbit testing (“IOT”) of the Intelsat 29e satellite (Call Sign S2913) at 49.7° W.L. and to drift the satellite to its permanent location of 50.0° W.L.<sup>2</sup> Intelsat 29e is scheduled to be launched on January 27, 2016.

Intelsat 29e IOT payload testing will be performed in the following frequency bands:

- 3700-4200 MHz, 10700-12500 MHz, and 19700-20200 MHz (space-to-Earth); and
- 5850-6725 MHz, 12750-13250 MHz, 13750-14500 MHz, 17300-17550 MHz, and 29500-30000 MHz (Earth-to-space).

Telemetry, Tracking, and Command (“TT&C”) services for Intelsat 29e will be performed in the following center frequencies: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, and 3702.75 MHz (space-to-Earth); and 5850.5 MHz, 5853.0 MHz, 6422.0 MHz, and 6424.5 MHz (Earth-to-space).

In support of its request, Intelsat submits the following information.

During the IOT of Intelsat 29e, Intelsat will operate in the above referenced C-, Ku-, and Ka-bands. To Intelsat’s knowledge, the only co-frequency, co-coverage, satellites within plus/minus six degrees of 49.7° W.L. are EchoStar XV at 45.1° W.L., Intelsat 14 at 45.0° W.L., NSS 806 at 47.6° W.L., Intelsat 1R at 50.0° W.L., Intelsat 23 at 53.0° W.L., Amazonas 1 at 55.4° W.L., Inmarsat 5F2 at 55.0° W.L., Intelsat 805 at 55.5° W.L., and Intelsat 34 at 55.5° W.L. Intelsat has completed coordination discussions with DISH Network, the operator of EchoStar XV; Hispasat, the operator of Amazonas 1; and Inmarsat, the

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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-01086, File No. SAT-LOA-20130722-0097 (May 22, 2015) (Public Notice). Only the satellite’s TT&C frequencies will be utilized during the drift from 49.7° W.L. to 50.0° W.L.

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operator of Inmarsat 5F2, regarding the Intelsat 29e IOT. Intelsat is currently in coordination discussions with SES World Skies, the operator of NSS 806 regarding the Intelsat 29e IOT and expects to complete discussions shortly. With regard to the remaining spacecraft, Intelsat has internally coordinated 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 49.7° W.L. Intelsat 29e 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 29e at 49.7° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 29e at 49.7° W.L. that is the subject of an International Telecommunications Union ("ITU") filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 29e's C-, Ku-, and Ka-band payloads at 49.7° W.L. is a critical step in ensuring that the satellite will be fully operational at 50.0° W.L. This, in turn, will ensure continuity of service to customers at the 50.0° 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,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers