

April 1, 2016

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 Operate Galaxy 11 at 60.1° E.L.; Call Sign: S2253

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days—commencing May 1, 2016—to operate Galaxy 11 (Call Sign S2253) temporarily at 60.1° E.L.<sup>2</sup> Specifically, Intelsat seeks STA to operate the Galaxy 11 satellite in the TT&C frequencies 14000.5 MHz, 14498.5 MHz, 11701 MHz, and 11702 MHz, as well as the communications frequencies 13750 – 14500 MHz, 10950 – 11200 MHz, and 11700 – 12200 MHz. Intelsat is relocating the Galaxy 11 satellite to meet a temporary requirement.

The Galaxy 11 satellite is currently drifting to 60.1° E.L. under STA<sup>3</sup> and is licensed permanently to operate at 55.6° W.L.<sup>4</sup> The satellite is expected to arrive on-station at 60.1° E.L. in early May 2016. At that location, Intelsat will operate the satellite’s communications payload in conformance with Intelsat’s coordination agreements concerning the nominal 60° E.L. location.

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. Galaxy 11 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 Galaxy 11 at 60.1° E.L. Finally, Intelsat is not aware of any system with an

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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> Intelsat also has a pending 180-day STA request to operate Galaxy 11 at 60.1° E.L. *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-01147, File No. SAT-STA-20160210-00017 (Apr. 1, 2016) (Public Notice). Due to the upcoming arrival date of Galaxy 11 and the need for authority for on-station TT&C to safely station-keep the satellite, Intelsat is filing this duplicate request.

<sup>3</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-01103, File No. SAT-STA-20150505-00033 (Aug. 21, 2015) (Public Notice).

<sup>4</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-01050, File No. SAT-MOD-20121018-00184 (Oct. 31, 2014) (Public Notice).

Ms. Marlene H. Dortch  
April 1, 2016  
Page 2

overlapping station-keeping volume with Galaxy 11 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat will operate Galaxy 11 in the 11700 – 12200 MHz band at 60.1° E.L against the United Kingdom's INTELSAT KUEXT 60E filing, in conformance with relevant coordination agreements. Intelsat respectfully requests that the United States Administration state its non-objection to the United Kingdom's use of Galaxy 11 for purposes of maintaining the INTELSAT KUEXT 60E filing.<sup>5</sup>

Grant of this STA request is in the public interest because it will allow Intelsat to meet a temporary requirement at 60.1° E.L. For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Sincerely,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>5</sup> Intelsat has included this request in prior Galaxy 11 to 60.1° E.L. STA requests. See Letter from Cynthia J. Grady, Regulatory Counsel for Intelsat License LLC, to Ms. Marlene H. Dortch, FCC (Jul. 24, 2015) (File No. SAT-STA-20150505-00033); Letter from Cynthia J. Grady, Regulatory Counsel for Intelsat License LLC, to Ms. Marlene H. Dortch, FCC (Mar. 8, 2016) (File No. SAT-STA-20160210-00017).