

April 19, 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 Drift Intelsat 1R to, and Operate at, 50.1° W.L.  
Call Sign: S2368

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 60 days, commencing June 1, 2016, of Special Temporary Authority (“STA”)<sup>1</sup> to drift Intelsat 1R (Call Sign S2368) from 50.0° W.L. to 50.1° W.L. and operate the satellite at 50.1° W.L.<sup>2</sup> Intelsat specifically requests authority to continue operating the communications payload on the satellite while drifting Intelsat 1R to 50.1° W.L. In addition, Intelsat seeks to extend the license term for Intelsat 1R for the duration of the STA.

The Intelsat 1R satellite currently is operating at 50.0° W.L.<sup>3</sup> Intelsat plans to relocate Intelsat 1R following transfer of some of its traffic to the recently-launched Intelsat 29e. Subject to receipt of FCC approval, the satellite will be relocated to 50.1° W.L. -- with an anticipated drift start date of June 1, 2016. The drift of Intelsat 1R is expected to take a few days.

During the drift to 50.1° W.L., Intelsat will utilize 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: 13995 MHz (H and V) and 14498.5 MHz (LHCP) for the uplink, and 11696 MHz (H, V and LHCP) and 11697 MHz (H, V, and LHCP) for the downlink. During the drift, Intelsat also will operate Intelsat 1R in the following communications

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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 has a pending application to modify the Intelsat 1R license to allow the satellite to drift to, and operate at, 50.1° W.L., as well as to extend the satellite’s license term through August 31, 2023. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01147, File No. SAT-MOD-20160219-00019 (Apr. 1, 2016) (Public Notice).

<sup>3</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00713, File No. SAT-MOD-20090720-00073 (Aug. 6, 2010) (Public Notice). PanAmSat Licensee Corp. subsequently assigned the Intelsat 1R license to Intelsat. *See Policy Branch Information; Actions Taken*, Report No. SAT-00746, File No. SAT-ASG-20101203-00252 (Dec. 29, 2010) (Public Notice).

frequencies: 3700-4200 MHz, 5925-6425 MHz, 10950-11200 MHz, 11450-11700 MHz, 11700-11950 MHz, 13750-14000 MHz, and 14000-14500 MHz.

Grant of this STA request will not result in increased risk of harmful interference. During the short drift from 50.0° W.L. to 50.1° W.L., Intelsat will operate the above listed TT&C frequencies, as well as the communications frequencies, in conformance with Intelsat's coordination agreements concerning the nominal 50° W.L. location. Intelsat also will coordinate the Intelsat 1R transmissions internally with the operations of Intelsat 29e. There are no other operators of co-frequency satellites in the drift path. Customers on Intelsat 1R will not experience service degradation because they will be tracking the satellite during the drift.<sup>4</sup>

Further, 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 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 1R at 50.1° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 1R that is the subject of an ITU filing and that is either in orbit or progressing towards launch.<sup>5</sup>

In support of this STA request, Intelsat asks that the prior waivers granted for Intelsat 1R at 50.0° W.L. be extended to the satellite at 50.1° W.L. and to Intelsat IR's requested extended license term. Specifically, Intelsat seeks continued waiver of Section 25.210(a)(3), Section 25.211(a), Section 25.114(d)(3), Sections 25.114(d)(14)(ii) and 25.283(c), and Section 2.106, footnote NG52<sup>6</sup> to the U.S. Table of Frequency Allocations<sup>7</sup> for the reasons set forth in the previous waiver grant.<sup>8</sup>

Grant of this STA request is in the public interest because it will allow Intelsat to continue to meet customer demand at the nominal 50° W.L. location while ensuring the safe station-keeping of both Intelsat 1R and Intelsat 29e.

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<sup>4</sup> The Commission previously has authorized a .1° drift during which the satellite's communications payload remained operational. *See Policy Branch Information; Actions Taken*, Report No. SAT-00998, File No. SAT-STA-20140212-00022 (Feb. 21, 2014) (Public Notice).

<sup>5</sup> Prior to its move to 50.1° W.L., Intelsat IR will be temporarily located at the same orbital location -- 50.0° W.L. -- as Intelsat 29e (Call Sign S2913). *See Policy Branch Information; Actions Taken*, Report No. SAT-01086, File Nos. SAT-LOA-20130722-00097 and SAT-AMD-20140718-00087 (May 22, 2015) (Public Notice).

<sup>6</sup> Footnote NG52 has replaced old footnote NG104.

<sup>7</sup> The Commission previously also waived former footnote 2 of Section 25.202(a)(1). That footnote no longer exists in its previous form.

<sup>8</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00713, File No. SAT-MOD-20090720-00073 (Aug. 6, 2010) (Public Notice).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this supplement to the undersigned at (703) 559-7848.

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