

May 18, 2016

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 Operate Intelsat 16 at 58.1° W.L.; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days—from May 23, 2016 through July 21, 2016—of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to operate Intelsat 16 (S2750) at 58.1° W.L.² Specifically, Intelsat is requesting an extension of STA to continue operating the Intelsat 16 satellite in the TT&C frequencies 12198.25 MHz, 12198.75 MHz, 13997.5 MHz, and 14499.5 MHz, as well as the communications frequencies 10700 – 11450 MHz, 11700 – 12200 MHz, 12750 – 13250 MHz, 13750 – 14000 MHz, and 14000 – 14500 MHz. Intelsat seeks this STA extension in order to continue meeting the demands of its customers.

Intelsat 16 is licensed permanently to operate at 79.0° W.L.³ Intelsat has a permanent license modification application pending to operate the satellite at 58.1° W.L.⁴ and is currently operating at 58.1° W.L. under temporary authority.⁵ Intelsat will continue to operate the Intelsat 16 communications payload in conformance with its coordination agreements concerning the nominal 58.0° W.L. location, 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-01121, File No. SAT-STA-20150925-00067 (Dec. 4, 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; Satellite Space Applications Accepted for Filing*, Report No. SAT-01138 (Feb. 26, 2016) (Public Notice).

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-01121, File No. SAT-STA-20150925-00067 (Dec. 4, 2015) (Public Notice).

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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 continue to 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 extension request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers