

June 22, 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 Conduct In-Orbit Testing of the
Intelsat 31 Satellite; Call Sign S2934

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 30-day extension, beginning July 10, 2016, of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to conduct in-orbit testing (“IOT”)² of the Intelsat 31 satellite (Call Sign S2934) at 132.0° W.L. and to drift the satellite to its permanent location of 95.05° W.L.³ Intelsat 31 was launched on June 9, 2016. The IOT period is expected to last approximately three weeks and the drift to 95.05° W.L. is expected to last approximately two weeks.

Intelsat 31 IOT payload testing will be performed in the following frequency bands:

- 3400 – 3700 MHz, 10950 – 11200 MHz, 11450 – 12200 MHz (space-to-Earth); and
- 6425 – 6725 MHz and 13750 – 145000 MHz (Earth-to-space).

Telemetry, Tracking, and Command (“TT&C”) services for Intelsat 31 will be performed in the following center frequencies: 11194.25 MHz, 11195.5 MHz, 11196.25 MHz, 11196.75 MHz (space-to-Earth); and 13998.5 MHz and 14006.0 MHz (Earth-to-space).

In support of its extension request, Intelsat includes the following information as submitted in its original STA request.

During the IOT of Intelsat 31, Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat’s knowledge, the only co-frequency, co-coverage, satellite within plus/minus six degrees of 132° W.L. is AMC-1 at 129.1° W.L. Intelsat is currently in coordination discussions with SES, the operator of AMC-1. Intelsat expects to complete coordination discussions before launch of the Intelsat 31 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-01160, File No. SAT-STA-20160503-00043 (Public Notice) (May 20, 2016).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01052, File No. SAT-LOA-20140410-00038 (November 7, 2014) (Public Notice). During the drift from 76.5° W.L. to 95.05° W.L., only the satellite’s TT&C frequencies will be utilized. At 95.05° W.L., Intelsat 31 will be co-located with Intelsat 30 (S2887) and Galaxy 3C (S2381).

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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 132.0° W.L. Intelsat 31 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 31 at 132.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 31 at 132.0° W.L. that is the subject of an International Telecommunications Union ("ITU") filing and that is either in orbit or progressing towards launch.

Finally, Intelsat requests that the waivers previously granted to Intelsat 31 at 95.05° W.L. be extended to the satellite at 132.0° W.L. In particular, Intelsat requests that the previously-granted waivers of Sections 25.202(a)(1) and 25.210(f) be extended to the satellite at 132.0° W.L., for the reasons previously set forth in the previous grant.

The IOT of Intelsat 31's C- and Ku-band payloads at 132.0° W.L. is a critical step in ensuring that the satellite will be fully operational at 95.05° W.L. This, in turn, will provide additional capacity to customers at the 95.05° 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