

June 23, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Special Temporary Authority to Drift and Operate Galaxy 11 at 45.0° E.L. and 44.9° E.L.; Call Sign: S2253

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 180 days—commencing September 1, 2016—to drift Galaxy 11 (Call Sign S2253) from 60.1° E.L. to 45.0° E.L., operate temporarily at 45.0° E.L., then to drift Galaxy 11 from 45.0° E.L. to 44.9° E.L., and operate at its final location of 44.9° E.L. 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 during the drift to and at 45.0° E.L. and 44.9° E.L. Intelsat also seeks STA to operate Galaxy 11 in the communications frequencies 13750 – 14500 MHz, 10950 – 11200 MHz, and 11700 – 12200 MHz at 45.0° E.L., and during the drift to, and at, 44.9° E.L.

The Galaxy 11 satellite is currently operating at 60.1° E.L. under STA² and is licensed permanently to operate at 55.6° W.L.³ Contingent on receipt of Commission authority, the satellite is expected to arrive on-station at 45.0° E.L. in mid-October 2016. Once on-station at 45.0° E.L., Intelsat will transfer a portion of the customer traffic currently carried on Intelsat 12, located at 45.0° E.L.,⁴ to Galaxy 11. Once the traffic transfer is complete Galaxy 11 will drift, while operating its communications frequencies, to its final location of 44.9° E.L. Intelsat plans in the near future to file a permanent modification application to operate Galaxy 11 at 44.9° E.L. At both locations and during the drift to 44.9° E.L., Intelsat will operate the communications payload in conformance with its coordination agreements concerning the nominal 45.0° E.L. location.

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-01158, File No. SAT-STA-20160210-00017 (May 13, 2016) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01050, File No. SAT-MOD-20121018-00184 (Oct. 31, 2014) (Public Notice).

⁴ Intelsat 12 is licensed by the United Kingdom.


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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. 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 except when Galaxy 11 is temporarily co-located with Intelsat 12 during traffic transition. 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 45.0° E.L. or 44.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 11 at either location 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 11.7-12.2 GHz band at the nominal 45.0° E.L against Germany's EUROPESTAR-BSS-45E filing, and the 3700-4200 MHz, 5925-6425 MHz, 10.95-11.2 GHz, 11.7-12.2 GHz, and 13.75-14.5 GHz bands against Germany's EUROPESTAR-45E-A filing, in conformance with relevant coordination agreements.

Grant of this STA request is in the public interest because it will allow Intelsat to provide additional capacity at the nominal 45.0° E.L. location. 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