

July 22, 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 Intelsat 904 to, and Operate at, 45.0° E.L. and 45.1° E.L.
Call Sign: S2408

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 180 days, commencing December 1, 2016, of Special Temporary Authority (“STA”)¹ for a two-phase relocation of the Intelsat 904 (Call Sign S2408) satellite. In the first phase, Intelsat seeks authority to drift Intelsat 904 from 60.0° E.L. to 45.0° E.L. and to operate at 45.0° E.L. temporarily for traffic transfer purposes. In the second phase, Intelsat seeks authority to drift Intelsat 904 from 45.0° E.L. to 45.1° E.L., while carrying communications traffic, and to operate the satellite at 45.1° E.L. At the nominal 45° E.L. location, Intelsat will operate Intelsat 904 pursuant to the International Telecommunication Union filing of the German Administration held by EUROPE*STAR Gesellschaft für Satellitenkommunikation mbH (“Europe*Star”), a joint venture that is 51 percent owned by a sister entity of Intelsat – PanAmSat Europe Corporation (“PanAmSat Europe”).²

Intelsat 904 is currently operating at 60.0° E.L.³ Subject to receipt of FCC approval, the satellite will be relocated initially to 45.0° E.L.—with an anticipated drift start date of December 1, 2016. The drift to

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 PanAmSat Europe is a Delaware company that is wholly owned by Intelsat Corporation. Certain members of the Shulte-Hillen family and other entities own the remaining 49 percent of Europe*Star. The German representative of the Schulte-Hillen family is Beatrix von Wietersheim. The managing directors of Europe*Star are Sajid Ajmeri and Mike Green. The officers and directors of PanAmSat Europe are: Kurt Riegelman – Director and Chairman, President & COO, Stephen Chernow – Director and VP & General Counsel, Mike Green – Director and VP & Controller, Henry Heuer, VP, Treasury and Tax, & Treasurer, and Sajid Ajmeri – VP & Secretary. Intelsat incorporates by reference the New Slot Usage Agreement between Europe*Star and PanAmSat Europe previously filed with the FCC. *See Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

³ *See Satellite Policy Branch Information; Applications Accepted For Filing*, Report No. SAT-00098, file No. SAT-MOD-20011221-00140 (Jan. 11, 2002) (Public Notice).

45.0° E.L. is expected to take approximately one month. Following transfer of traffic from Intelsat 12 to Intelsat 904, Intelsat will drift the latter to 45.1° E.L., while carrying communications traffic. Intelsat is relocating the Intelsat 904 satellite in order to ensure service continuity at the nominal 45° E.L. location, as Intelsat 12 is expected to be deorbited at the end of 2017.

During the drift of the Intelsat 904 satellite from 60.0° E.L. to 45.0° E.L., Intelsat will utilize only the satellite's telemetry, tracking, and control ("TT&C") frequencies. The specific TT&C frequencies are: 6173.7 MHz and 6176.3 MHz (uplink) and 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (downlink).

Once on-station at 45.0° E.L., while drifting to 45.1° E.L., and on-station at 45.1° E.L., Intelsat will also operate Intelsat 904 on the following communications frequencies: 3625-3700 MHz, 3700-4200 MHz, 5850-5925 MHz, 5925-6425 MHz, 10950-11200 MHz, 11450-11700 MHz, and 14000-14500 MHz.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will coordinate its TT&C transmissions with operators of co-frequency satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Although Intelsat 904 will drift between 45.0° E.L. and 45.1° E.L. while carrying communications traffic, there are no co-frequency satellites between 45.0° E.L. and 45.1° E.L., and Intelsat will coordinate the Intelsat 904 transmissions with those of Intelsat 12. On-station at both 45.0° E.L. and 45.1° E.L., and while drifting from the former to the latter, Intelsat will operate Intelsat 904 in conformance with Europe*Star's coordination agreements concerning the nominal 45° E.L. location.

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. At 45.0° E.L., Intelsat 904 will be temporarily located at the same orbital location as Intelsat 12, a U.K.-licensed satellite, for purposes of traffic transition. 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 904 at either 45.0° E.L. or 45.1° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 904 at either 45.0° E.L. or 45.1° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The redeployment of Intelsat 904 as requested herein will ensure service continuity at the nominal 45° E.L. orbital location. Accordingly, grant of this STA request is in the public interest.

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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,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers