September 21, 2016

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 180 days, commencing December 1, 2016, of Special Temporary Authority ("STA")[1] to drift the Intelsat 5 satellite (Call Sign S2704) from 157.0° E.L. to 59.9° E.L. and operate the satellite temporarily at 59.9° E.L. in the C- and Ku-bands.

The Intelsat 5 satellite is currently operating at 157.0° E.L.[2] Subject to receipt of FCC approval, the satellite will be relocated to 59.9° E.L., with the drift starting no earlier than December 1, 2016. The satellite is expected to arrive on-station by early March 2017. Intelsat is relocating the Intelsat 5 satellite to meet a potential service demand.

During the drift of the Intelsat 5 satellite from 157.0° E.L. to 59.9° E.L., Intelsat will utilize only 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:

Uplink:	Downlink:
14498 MHz (H)	11451 MHz (H, V, and RHCP)
13999 MHz (RHCP)	11452 MHz (H, V, and RHCP)
	11454 MHz (RHCP and LHCP)

Once located at 59.9° E.L., Intelsat 5 will also operate on the following communications frequencies:

Uplink:	Downlink:
5925-6425 MHz	3700-4200 MHz
12750-13250 MHz	10700-10950 MHz
14000-14250 MHz	11200-11450 MHz
	11450-11700 MHz

[1] Intelsat has filed this STA request, an FCC Form 159, and a $945.00 filing fee electronically via the International Bureau's Filing System.

[2] *See Policy Branch Information; Actions Taken*, Report No. SAT-01045, File No. SAT-MOD-20140829-00097 (Oct. 10, 2014) (Public Notice).

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once Intelsat 5 is on-station at 59.9° E.L., Intelsat will operate the satellite's communications payload in conformance with Intelsat's coordination agreements concerning the nominal 60.0° E.L. location.

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. Intelsat 5 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 5 at 59.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 59.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Grant of this STA request is in the public interest because it will allow Intelsat to meet a potential service demand at 59.9° E.L.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spears