

October 18, 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 1R to, and Operate at, 169.2° E.L.
Call Sign: S2368

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 180 days, commencing January 1, 2017, of Special Temporary Authority (“STA”)¹ to drift Intelsat 1R (Call Sign S2368) from 50.1° W.L. to 169.2° E.L. and operate the satellite temporarily at 169.2° E.L.

The Intelsat 1R satellite is currently operating at 50.1° W.L.² Subject to receipt of FCC approval, the satellite will be relocated to 169.2° E.L.—with the drift starting no earlier than January 1, 2017. The drift should take approximately four months. Intelsat is relocating the Intelsat 1R satellite to meet a potential service demand.

During the drift of the Intelsat 1R satellite from 50.1° W.L. to 169.2° 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: 13995 MHz and 14498.5 MHz (Earth-to-space); and 11696 MHz and 11697 MHz (space-to-Earth).

Once Intelsat 1R is located at 169.2° E.L., Intelsat will also operate the following communications frequencies on the satellite: 5925 – 6425 MHz, 13750 – 14500 MHz, and 11700 – 12200 MHz (Earth-to-space); and 3700 – 4200 MHz, 10950 – 11200 MHz, and 11450 – 11950 MHz (space-to-Earth).

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. At 169.2° E.L., Intelsat will operate Intelsat 1R in conformance with Intelsat’s coordination agreements concerning the nominal 169° E.L. location.

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-01156, File No. SAT-MOD-20160219-00019 (May 6, 2016) (Public Notice).

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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. Intelsat 1R 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 1R at 169.2° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 1R that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

In addition, Intelsat requests that all applicable waivers previously granted to Intelsat 1R at 50.1° W.L. be extended to the satellite at 169.2° E.L.³ Specifically, Intelsat requests that the previously-granted waivers be extended for the reasons set forth in the previous grant.⁴

Grant of this STA request is in the public interest because it will allow Intelsat to meet a potential service demand at 169.2° E.L.

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,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

³ Due to the modification of several technical rules, certain waivers previously issued to Intelsat for operation of the Intelsat 1R satellite are no longer required. E.g., Section 25.211(a), 25.202(g), Section 25.114(d)(3), and Section 25.283(c) recently have been eliminated or modified, so waivers are no longer required under the new Part 25 rules. See *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Second Report and Order, IB Docket No. 12-267, FCC 15-167 at ¶ 333 (rel. Dec. 17, 2015).

⁴ See *supra* n. 2.