

March 14, 2017

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

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 35e;  
Call Sign S2959

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 90 days, beginning May 25, 2017, to conduct in-orbit testing (“IOT”) of the Intelsat 35e satellite (Call Sign S2959) at 33.0° W.L. and to drift the satellite to its permanent location of 34.5° W.L.<sup>2</sup> Intelsat 35e is scheduled to be launched no earlier than May 15, 2017. The IOT period is expected to last approximately 45 days and the drift to 34.5° W.L. is expected to last approximately five days.<sup>3</sup>

Intelsat 35e payload testing will be performed in the following frequency bands:

- 3625 – 4200 MHz, 10950 – 11200 MHz, and 11450 – 11700 MHz, (space-to-Earth); and
- 5850 – 6425 MHz, 13750 – 14000 MHz, and 14000 – 14500 MHz (Earth-to-space).

Telemetry, Tracking, and Command (“TT&C”) services for Intelsat 35e will be performed in the following center frequencies:

- 4197.75 MHz, 4198.25 MHz, 4198.75 MHz, and 4199.25 MHz (space-to-Earth); and
- 5853.0 MHz and 6424.5 MHz (Earth-to-space).

In support of its request, Intelsat submits the following information.

During the IOT of Intelsat 35e, Intelsat will operate in the above referenced C- and Ku-bands. Intelsat has identified the operational satellites within +/-6 degrees of the IOT location. Coordination is ongoing

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$945.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01191, SAT-LOA-20160408-00034 (Oct. 7, 2016) (Public Notice). During the drift from 33.0° W.L. to 34.5° W.L., only the satellite’s TT&C frequencies will be utilized.

<sup>3</sup> Intelsat is seeking authority for 90 days to accommodate a possible launch delay.

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with several operators of such satellites to resolve potential interference issues. Additionally, Intelsat is internally coordinating the proposed testing with potentially affected Intelsat satellites. Intelsat expects to complete coordination discussions before IOT of the Intelsat 35e satellite commences. 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 33.0° W.L. Intelsat 35e 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 Federal Communications Commission (“FCC”) licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 35e at 33.0° W.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 35e at 33.0° W.L. that is the subject of an International Telecommunications Union (“ITU”) filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 35e’s C- and Ku-band payloads at 33.0° W.L. is a critical step in ensuring that the satellite will be fully operational at 34.5° W.L. This, in turn, will provide additional capacity to customers at the 34.5° 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,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers