

June 26, 2016

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

Re: Request for Extension of Special Temporary Authority to Operate Intelsat 1R at 169.2° E.L.  
Call Sign: S2368

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 1R (Call Sign S2368) to and operate the satellite at 169.2° E.L.<sup>2</sup> The Intelsat 1R satellite arrived on station at 169.2° E.L. on June 12, 2017.

At 169.2° E.L., Intelsat 1R will continue to operate in the following frequencies:

- Telemetry, tracking, and control (“TT&C”): 13995 MHz and 14498.5 MHz (Earth-to-space); and 11696 MHz and 11697 MHz (space-to-Earth).
- Communications: 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 extension request will not result in increased risk of harmful interference. At 169.2° E.L., Intelsat will continue to operate Intelsat 1R in conformance with Intelsat’s coordination agreements concerning the nominal 169° E.L. location.

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. for the reasons set forth in the Commission’s permanent grant of authority for Intelsat 1R at 50.1° W.L.<sup>3</sup>

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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-01226, File No. SAT-STA-20161018-00099 (Mar. 24, 2017) (Public Notice). The Federal Communications Commission (“Commission”) granted 180 days of STA on December 22, 2016 for the drift of Intelsat 1R and deferred grant of communication frequencies operations at 169.2° E.L. On March 22, 2017, the Commission granted 180 days of STA authority for the operation of the satellite’s communication frequencies operations at 169.2° E.L., backdating the start date of the grant term to January 1, 2017. Accordingly, existing operational authority will expire on June 29, 2017.

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Grant of this STA extension request is in the public interest because it will continue to 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 extension request. Please direct any questions regarding this STA extension request to the undersigned at (703) 559-6949.

Sincerely,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01156, File No. SAT-MOD-20160219-00019 (May 6, 2016) (Public Notice). 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).