

August 22, 2017

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

Re: Request for Further 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”)¹ previously granted Intelsat to drift Intelsat 1R (Call Sign S2368) to and operate the satellite at 169.2° E.L.² 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 further 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.³

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-01260, File No. SAT-STA-20170725-00107 (Aug. 11, 2017) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01253, File No. SAT-STA-20170626-00101 (July 14, 2017) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01226, File No. SAT-STA-20161018-00099 (Mar. 24, 2017) (Public Notice).

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Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue to operate Intelsat 1R at 169.2° E.L. prior to the satellite's planned upcoming redeployment to 157.1° E.L. in mid-September 2017.⁴

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA further 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

³ 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. For example, 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 *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01252, File No. SAT-STA-20170626-00100 (July 14, 2017) (Public Notice).