

November 9, 2017

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 Drift and Operate Intelsat 16 at 76.2° W.L.; Call Sign: S2750

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 16 (S2750) to, and operate at, 76.2° W.L. in the telemetry, tracking, and command (“TT&C”) frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 11700 – 12200 MHz and 14000 – 14500 MHz.<sup>2</sup> Intelsat seeks this STA in order to continue assisting a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico. Intelsat 16 arrived on-station at 76.2° W.L. on October 30, 2017.

Intelsat 16 is currently is licensed to operate at 58.1° W.L.<sup>3</sup> Intelsat also has a pending 180-day STA request to operate Intelsat 16 at 76.2° W.L.<sup>4</sup>

Once at 76.2° W.L., Intelsat will operate Intelsat 16 on a non-interference/non-protected basis and in conformance with coordination agreements concerning the nominal 76.2° W.L. location. As the Commission is aware, DIRECTV Enterprises, LLC (“DIRECTV”) currently holds a license to operate in Ku-band at 76.2° W.L. (“DIRECTVKU-76W License”).<sup>5</sup> DIRECTV fully supports this extension request to allow Intelsat 16 temporarily to operate at 76.2° W.L.

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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> Although Intelsat 16 also includes the bands 10700 – 11450 MHz, 12750 – 13250 MHz, and 13750 – 14000 MHz, Intelsat is not seeking authority to operate in these bands in this request except for the 13997.5 MHz frequency used for uplink TT&C, noted above.

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01160, File No. SAT-MOD-20160201-00009 (May 20, 2016) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Space Station Applications Accepted for Filing*, File No. SAT-STA-20171016-00140 (Oct. 27, 2017) (Public Notice).

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00943, File No. SAT-LOA-20121101-00190 (Apr. 19, 2013) (Public Notice).

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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 16 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, with the exception of the DIRECTV KU-76W License, 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 16 at 76.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 16 at 76.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Grant of this STA extension request will allow Intelsat to continue drifting Intelsat 16 to a 76.2° W.L., where it will provide critical communication services in Puerto Rico. Accordingly, grant of this STA extension request is in the public interest.

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

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

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