

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of Application of	)	
	)	
ES 172 LLC	)	File No. SAT-STA-_____
	)	Call Sign S2610
For Special Temporary Authority to Drift	)	
EUTELSAT 172A from 172° E.L. to 174° E.L.	)	

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

ES 172 LLC, an indirect, wholly owned subsidiary of Eutelsat S.A. (“Eutelsat”), pursuant to Section 25.120(a) of the Commission’s rules, respectfully requests Special Temporary Authority (“STA”) beginning November 22, 2017, or as soon as practicable thereafter, to drift EUTELSAT 172A satellite (Call Sign S2610) from the 172° East Longitude (“E.L.”) orbital location to the 174° E.L. orbital location. ES 172 LLC will shortly file a separate request for authority to operate EUTELSAT 172A at the 174° E.L. orbital location that will enable the satellite to supplement available capacity in the Asia-Pacific region to satisfy, among other things, urgent U.S. government communications requirements.

ES 172 LLC is the licensee of the EUTELSAT 172A satellite and, together with its Eutelsat affiliates, operates the satellite’s communications payloads to support a wide range of traditional fixed-satellite service (“FSS”) and satellite mobility applications throughout the Asia-Pacific region. The Commission recently granted ES 172 LLC an STA to operate the C-band and Ku-band payloads on EUTELSAT 172B, a new satellite constructed and launched under authority issued by the government of France, as a replacement for EUTELSAT 172A.<sup>1</sup> This STA grant

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<sup>1</sup> See File No. SAT-STA-20171104-00149, Call Sign S3021 (granted Nov. 16, 2017). ES 172 LLC’s application for long-term commercial authority for the EUTELSAT 172B satellite payloads remains pending. See File No. SAT-RPL-20170927-00136, Call Sign S3021.

allows EUTELSAT 172A, a satellite specifically designed to provide services in the Asia-Pacific region, to be immediately redeployed to the adjacent 174° E.L. orbital location.

During the drift of EUTELSAT 172A from 172° E.L. to 174° E.L. and until the Commission grants authority to operate the satellite's communications payloads at the new location, the satellite will utilize only TT&C frequencies.<sup>2</sup> The specific TT&C frequencies (beacon) to be used are as follows:

C-band Uplink  
5926.5 MHz (H)

C-band Downlink  
3703.5 (H)  
4199.5 (V)

A Ku-band beacon will also be functional:

Ku-band Downlink  
11199 (R)  
12749 (L)

These TT&C operations will be on an unprotected, non-harmful interference basis only and Eutelsat will follow industry practices for coordinating physical operation of the satellite and TT&C transmissions during the satellite drift process.

In connection with the proposed drift, Eutelsat has assessed and limited the probability of the satellite becoming a source of debris as a result of collision with large debris or other operational space stations. EUTELSAT 172A will not be located at or pass through an orbital location that contains another active geostationary satellite and, other than EUTELSAT 172B at

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<sup>2</sup> Because this STA request proposes operation of TT&C frequencies only, a complete Schedule S is not submitted herewith. Instead, full operational information for the EUTELSAT 172A satellite, including complete Schedule S data, will be submitted with the application to operate the satellite at the 174° E.L. orbital location.

172° E.L. (the location which EUTELSAT 172A is vacating), there are no satellites with an overlapping station-keeping volume.

Grant of this STA request is in the public interest because it will facilitate efficient use of a U.S.-licensed satellite to help meet urgent U.S. government service requirements in the Asia-Pacific region. Furthermore, grant will not increase the potential for interference from EUTELSAT 172A operations because the satellite will operate only the above-listed TT&C frequencies during the drift. Finally, ES 172 LLC expressly acknowledges that grant of the requested STA is without prejudice to Commission consideration of any request for operating authority at 174° E.L., and that all actions taken in reliance on any grant of this STA request are at ES 172 LLC's sole risk.

For the reasons set forth herein, ES 172 LLC respectfully requests that the Commission grant this request to drift the EUTELSAT 172A satellite from the 172° E.L. orbital location to the 174° E.L. orbital location at the earliest practicable time.