

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

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

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 60-day special temporary authority (“STA”) beginning on November 29, 2017, or as soon as practicable thereafter, to permit operation of the EUTELSAT 172A satellite (Call Sign S2610) at the 174° E.L. orbital location. ES 172 LLC has concurrently filed a satellite license modification application for long-term operation of EUTELSAT 172A at this location.¹ Grant of this STA request will allow EUTELSAT 172A to immediately 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 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 authority to operate the C-band and Ku-band payloads on EUTELSAT 172B to replace EUTELSAT 172A at 172° E.L.,² as well as an STA to drift the EUTELSAT 172A

¹ See ES 172 LLC, File No. SAT-MOD-20171122-00159, Call Sign S2610 (“*EUTELSAT 172A Modification Application*”).

² See ES 172 LLC, 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.

satellite to the 174° E.L. orbital location.³ These grants facilitate consideration of this request to operate EUTELSAT 172A at 174° E.L. to satisfy urgent U.S. government communications needs.⁴

ES 172 LLC contemplates no material changes to the overall operating parameters of EUTELSAT 172A and, once located at 174° E.L., the satellite will operate essentially as it does today. ES 172 LLC hereby incorporates by reference the satellite operational parameters and other information provided in the separately filed *EUTELSAT 172A Modification Application*. That application provides the full range of technical and public interest information supporting long-term commercial operations of the satellite at its new location.

Grant of this short-term STA request is also 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. In addition, an STA will enable the new services on EUTELSAT 172A at the 174° E.L. orbital location, thereby enhancing capacity and competition in satellite services provided to U.S. customers in the region. ES 172 LLC expressly acknowledges that grant of the requested STA is without prejudice to Commission consideration of the *EUTELSAT 172A Modification Application* for long-term 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 60-day STA request to operate the EUTELSAT 172A satellite from the 174° E.L. orbital location commencing on November 29, 2017, or as soon as practicable thereafter.

³ ES 172 LLC, File No. SAT-STA-20171117-00157, Call Sign S2610 (granted Nov. 21, 2017).

⁴ EUTELSAT 172A is expected to arrive at the 174° E.L. orbital location near the end of the month. ES 172 LLC seeks to commence commercial operations to support satellite broadband and mobility applications, including U.S. government communications requirements in the region, no later than December 1, 2017.