

May 9, 2018

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

Re: Request for Special Temporary Authority to Drift Intelsat 9 to 66.15° E.L.
Call Sign: S2380
EXPEDITED TREATMENT REQUESTED

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 60 days of expedited Special Temporary Authority (“STA”), commencing May 20, 2018, to drift Intelsat 9 (Call Sign S2380) from 29.5° W.L. to 66.15° E.L. The drift is expected to take approximately eight months. Intelsat has a pending permanent license application for this redeployment.¹

The Intelsat 9 satellite’s permanent licensed location is 29.5° W.L.² Subject to receipt of Federal Communications Commission approval, the satellite will be relocated to 66.15° E.L.³ Intelsat is seeking expedited treatment because the traffic transfer from Intelsat 9 to Intelsat 901 will be completed ahead of schedule, which allows for the acceleration of Intelsat 9’s redeployment. This will, in turn, allow Intelsat 9 to provide additional capacity at 66.15° E.L. at an earlier date than previously anticipated.

During the drift of the Intelsat 9 satellite from 29.5° W.L. to 66.15° E.L., Intelsat will only utilize the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will follow industry practices for coordinating TT&C transmission during the relocation process. The specific TT&C frequencies are as follows: 14.0005 GHz and 14.4945 GHz in the uplink; and 11.7005 GHz and 11.7020 GHz in the downlink.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its

¹ See *Intelsat License LLC*, Application to Modify Authorization for Intelsat 9 (Call Sign S2380), File No. SAT-MOD-20180305-00019 (filed Mar. 5, 2018).

² See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01236, File No. SAT-MOD-20161110-00105 (May 5, 2017).

³ Intelsat 17 is currently operating at 66.0° E.L. See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00748, File No. SAT-LOA-20100726-00167 (Jan. 7, 2011). The Intelsat 9 and Intelsat 17 satellites will be collocated at the nominal 66.0° E.L. location.


Ms. Marlene H. Dortch
May 9, 2018
Page 2

TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

Grant of this STA request is in the public interest because it will allow Intelsat to provide additional capacity from the 66.15° E.L. orbital location.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this STA request. Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive style with a large initial "C".

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers