

May 23, 2018

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

Re: Request for Extension 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 180 days of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to operate telemetry, tracking, and command (“TT&C”) and communication frequencies on Intelsat 16 (S2750) at 76.2° W.L.² 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 is currently licensed to operate at 58.1° W.L.³ and Intelsat has a pending application to modify the Intelsat 16 license to permanently operate it at 76.2° W.L.⁴ At 76.2° W.L. Intelsat 16 will continue to operate in the following TT&C frequencies: 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the following communications frequencies: 11700-12200 MHz and 14000-14500 MHz.⁵

Additionally, grant of this STA extension request will not result in increased risk of harmful interference. At 76.2° W.L., Intelsat will continue to operate Intelsat 16 on a non-interference/non-protected basis and in conformance with coordination agreements concerning the nominal 76.2° W.L. location. In the

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, Public Notice*, Report No. SAT-01287, File No. SAT-STA-20171016-00140 (Dec. 1, 2017) (Public Notice).

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

⁴ See *Intelsat License LLC, Modification Application to Permanently Maintain and Continue to Operate Intelsat 16 at 76.2 W.L.*, File No. SAT-MOD-20180424-00029 (filed Apr. 24, 2018).

⁵ Intelsat will continue operations pursuant 47 C.F.R. § 1.62 pending action on this timely filed STA extension request.

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unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Grant of this STA extension request will allow Intelsat to assist a customer in providing critical communication services in Puerto Rico. Accordingly, grant of this request is in the public interest.

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

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

Cc: Jose Albuquerque
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Jay Whaley
Cindy Spiers
Kathryn Medley