

May 31, 2018

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

Re: Request for Extension of Special Temporary Authority to Drift Intelsat 5 to, and Operate at,
137.0° W.L.
Call Sign: S2704

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Intelsat 5 (Call Sign S2704) to 137.0° W.L. and operate the satellite at 137.0° W.L.² Intelsat 5 arrived at 137.0° W.L. on May 31, 2018, and its permanently licensed location is 156.9° E.L.³

The Federal Communication Commission (“FCC” or “Commission”) recently made available for reassignment the C-band frequencies at 137° W.L.,⁴ which provides a new opportunity for the Intelsat 5 satellite. Intelsat has filed to modify the authorization for the Intelsat 5 satellite to permanently redeploy Intelsat 5 to 137.0° W.L.⁵

The specific TT&C frequencies of the Intelsat 5 spacecraft are as follows: 14498 MHz (H) and 13999 MHz (RHCP) in the uplink; and 11451 MHz (H, V, and RHCP), 11452 MHz (H, V, and RHCP), and 11454 MHz (RHCP, and LHCP) in the downlink; and the communications frequencies are: 5925-6425 MHz, 12750-13250 MHz, and 14000-14250 MHz in the uplink; and 3700-4200 MHz, 10700-10950 MHz, 11200-11450 MHz, and 11450-11700 MHz in the downlink.

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-01314, File No. SAT-STA-20180502-00039 (May 11, 2018) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01236, File No. SAT-MOD-20170331-00057 (May 5, 2017) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01313 (Apr. 27, 2018) (Public Notice).

⁵ See *Intelsat License LLC Modification of Authorization to Redeploy to, and Operate Intelsat 5 (S2704) at, 137.0 W.L.*, File No. SAT-MOD-20180501-00036 (filed May 1, 2018).

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Grant of this STA extension request will not result in increased risk of harmful interference. On-station at 137.0° W.L., Intelsat will continue operate in conformance with FCC rules and any relevant coordination agreements.

In addition, Intelsat requests that the waiver previously granted to Intelsat 5 at 156.9° E.L. be extended to the satellite at 137.0° W.L. Specifically, Intelsat requests that the waiver of Section 25.114(c)(4)(vi)(A) of the FCC's rules, requiring applicants to provide predicted space station antenna gain contours for each transmit and receive antenna beam requested, previously granted for Intelsat 5 be extended to the satellite at 137.0° W.L.⁶

Grant of this STA extension request is in the public interest because it will allow Intelsat to provide new capacity from the 137.0° W.L. orbital location.

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

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁶ See 47 C.F.R. § 25.114(c)(4)(vi)(A); *Application of Intelsat License LLC to Modify Authorization for Intelsat 5 (S2704)*, Stamp Grant, File No. SAT-MOD-20170331-00057, Condition 9 (May 4, 2017).