



**INTELSAT.**

*Envision. Connect. Transform.*

September 5, 2018

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

Re: Request for Extension of Special Temporary Authority to Drift Intelsat 805 to, and Operate at, 169.1° E.L.;  
Call Sign: S2404

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of the Special Temporary Authority (“STA”),<sup>1</sup> previously granted Intelsat, to drift Intelsat 805 (S2404) from 169.0° E.L. to, and operate at, 169.1° E.L.<sup>2</sup> Intelsat seeks an STA extension to continue operating the telemetry, tracking, and command (“TT&C”) and communications frequencies on the Intelsat 805 on-station at 169.1° E.L. Intelsat has a pending 180-day STA request for this redeployment.<sup>3</sup>

Intelsat 805’s TT&C frequencies are: 6173.7 MHz, 6176.3 MHz, and 12198.75 MHz in the uplink; and 3947.5 MHz, 3948.0 MHz, 3950.0 MHz, and 3952.0 MHz in the downlink. Intelsat 805’s communications frequencies are: 5850-6650 MHz and 14000-14250 MHz in the uplink; and 3400-4200 MHz and 12500-12750 MHz in the downlink.

The Intelsat 805 satellite is currently operating at 169.1° E.L.<sup>4</sup> In order to bridge any gaps in service that will occur between the start of inclined orbit operation of Intelsat 805<sup>5</sup> and the arrival of Horizons

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01335, File No. SAT-STA-20180719-00054 (Aug. 3, 2018) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Space Station Applications Accepted for Filing*; File No. SAT-STA-20180703-00050 (July 27, 2018) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-MOD-20151020-00072 (Feb. 26, 2016) (Public Notice).

<sup>5</sup> See Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20151020-00072 (June 27, 2017).

3e S2947),<sup>6</sup> JCSAT-RA (S2960) will be nominally collocated with Intelsat 805.<sup>7</sup> Both Intelsat 805 and JCSAT-RA will operate at the nominal 169° E.L. until the arrival of Horizons 3e later this year.<sup>8</sup>

Grant of this STA extension will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat's communications payload and TT&C frequencies at 169.1° E.L. in conformance with existing coordination agreements and the Federal communications Commission's ("FCC" or "Commission") rules governing operations vis-à-vis adjacent locations.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 805 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 805 at 169.1° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 805 at either location that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

In addition, Intelsat requests that the waiver previously granted to Intelsat 805 at 169.0° E.L. be extended to the satellite at 169.1° E.L. Specifically, Intelsat requests that the waiver of Sections 2.106, 25.114(d)(14)(ii), 25.202(a)(1), 25.202(g), 25.210(a)(3), 25.210(i)(1), 25.210(f),<sup>9</sup> and 25.283(c)

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<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01313, File No. SAT-MOD-20170622-00093 (Apr. 27, 2018).

<sup>7</sup> JCSAT-RA is currently operating at 128.0° E.L. Contingent on receipt of Commission authority, JCSAT-RA will be relocated to 169.0° E.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01211, File No. SAT-LOA-20160411-00035 (Jan. 27, 2017) (Public Notice).

<sup>8</sup> Out of an abundance of caution, and to the extent necessary, Intelsat requests a waiver of Condition 19 of the Horizons 3e grant, which requires that Intelsat 805 continue providing service from 169.0° E.L. in the 3700-4200 MHz, 5925-3425 MHz, 10.85-11.7 GHz, 12.5-12.75 GHz, and 14.0-14.25 GHz bands until Horizons 3e begins providing services at 169.0° E.L. See Horizons-3 License LLC Application to Modify Authorization for Horizons 3e Satellite (S2947), File No. SAT-MOD-20170622-00093 (condition #19, stamp grant issued Apr. 25, 2018 by Stephen J. Duall). Intelsat is seeking to move Intelsat 805 one tenth of a degree to accommodate the arrival of JCSAT-RA at 169.0° E.L. and ensure safe station-keeping of the satellites located at nominal 169° E.L. This accommodation will allow Intelsat to continue providing continuity of service to customers at nominal 169° E.L. until Horizons 3e arrives. As such, to the extent a waiver is required, grant would serve the public interest.

<sup>9</sup> Intelsat 805 previously obtained a waiver of Section 25.210(g)(1), which required full frequency reuse. This requirement is now included in Section 25.210(f).

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of the Commission's rules be extended to the satellite at 169.1° E.L. for the reasons previously set forth.<sup>10</sup>

Grant of this STA extension request is in the public interest because it will allow Intelsat to ensure continuity of service at the nominal 169° E.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 request to the undersigned at (703) 559-6949.

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat US LLC

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>10</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-MOD-20151020-00072 (Feb. 26, 2016) (Public Notice).