



INTELSAT.

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December 11, 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 Conduct In-Orbit Testing of the Horizons 3e Satellite; Call Sign S2947

Dear Ms. Dortch:

Horizons-3 License LLC (“IntelSat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted IntelSat to conduct in-orbit testing (“IOT”)² of the Horizons 3e satellite (Call Sign S2947) at 164.2° E.L. and to drift the satellite to its permanent location of 169.0° E.L.³ Horizons 3e was launched on September 25, 2018. The IOT period is expected to last approximately forty days and the drift to 169.0° E.L. is expected to last approximately ten days.

Horizons 3e IOT payload testing will continue to be performed in the following frequency bands:

- 3700-4200 MHz, 10850-11700 MHz and 12200-12750 MHz (space-to-Earth); and
- 5925-6425 MHz, 12920-13250 MHz, and 13750-14500 MHz (Earth-to-space).

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

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01352, File No. SAT-STA-20180905-00066 (Oct. 12, 2018) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01313, File No. SAT-MOD-20170622-00093 (Apr. 27, 2018) (Public Notice). During the drift from 164.2° E.L. to 169.0° E.L., only the satellite’s TT&C frequencies will be utilized.

Telemetry, Tracking, and Command (“TT&C”) services for Horizons 3e will continue to be performed in the following center frequencies and frequency bands:

- 4197.75 MHz, 4198.25 MHz, 4198.75 MHz, and 4199.25 MHz (space-to-Earth); and
- 5850.0-5853.5 MHz and 6421.5-6425.0 MHz (Earth-to-space).

In support of its extension request, Intelsat submits the following information. During the IOT of Horizons 3e, Intelsat will continue to operate in the above referenced C- and Ku-bands. Intelsat has completed coordination with all operational satellites within +/-6 degrees of the IOT location. In unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations during IOT at 164.2° E.L. Horizons 3e 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 Horizons 3e at 164.2° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Horizons 3e at 164.2° E.L. that is the subject of an International Telecommunications Union (“ITU”) filing and that is either in orbit or progressing towards launch.

Finally, Intelsat requests that the waivers previously granted to Horizons 3e at 169.0° E.L. be extended to the satellite at 164.2° E.L. In particular, Intelsat requests that the previously-granted waivers of Sections 25.202(a)(1), 2.106, and Footnote US245 of the U.S. Table of Allocations be extended to the satellite at 164.2° E.L., for the reasons previously set forth in the license grant.⁴

The IOT of Horizons 3e’s C- and Ku-band payloads at 164.2° E.L. is a critical step in ensuring that the satellite will be fully operational at 169.0° E.L. This, in turn, will provide additional capacity to customers at the 169.0° E.L. location, and thereby promotes the public interest.

⁴ See *supra* n.2.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this extension request.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers