



**INTELSAT.**

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February 4, 2019

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

Re: Request for Special Temporary Authority to Drift Galaxy 11 to 93.1° W.L.  
Call Sign: S2253

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests 60 days, commencing February 20, 2019, of Special Temporary Authority (“STA”)<sup>1</sup> to drift Galaxy 11 (Call Sign S2253) from 44.9° E.L. to 93.1° W.L. IntelSat is relocating Galaxy 11 after the successful launch and arrival of IntelSat 38 at 45.0° E.L.<sup>2</sup> and currently has a pending application for this redeployment.<sup>3</sup>

The Galaxy 11 satellite is currently operating at 44.9° E.L.<sup>4</sup> Subject to receipt of Federal Communications Commission (“FCC or Commission”) approval, the satellite will be relocated to

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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> IntelSat 38 is a Ku-band satellite authorized by Azerbaijan and is also known as Azerspace-2.

<sup>3</sup> See *IntelSat License LLC Modification of Authorization to Redeploy Galaxy 11 (S2253) to 93.1 W.L., Add New Frequencies, and Extend License Term*, File No. SAT-MOD-20181231-00095 (filed Dec. 31, 2018).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01201, File No. SAT-MOD-20160803-00077 (Nov. 18, 2016) (Public Notice). On January 18, 2019, Galaxy 11 experienced a position-control anomaly. The anomaly has been corrected and the thrusters currently are working as expected. IntelSat does not expect this event to affect the drift of Galaxy 11 or its future operations. See Email from Vejon Cummings, Federal Communications Commission Operations Center, to Cynthia Grady, IntelSat US LLC (Jan. 18, 2019); Letter from Cynthia J. Grady, IntelSat US LLC to Marlene H. Dortch, Federal Communications Commission (Jan. 18, 2019).

93.1° W.L. where it will replace Galaxy 25 (Call Sign S2154).<sup>5</sup> The drift of Galaxy 11 is expected to begin after the transfer of traffic to Intelsat 38 and to take approximately six months. Additionally, Intelsat expects to begin inclined orbit operations during the satellite's drift to 93.1° W.L.

During the drift of Galaxy 11 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 TT&C frequencies are as follows: 14000.5 MHz, 14498.5 MHz, 11701 MHz, and 11702 MHz.

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 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.

Further, 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. Galaxy 25 is currently operating at 93.1° W.L.<sup>6</sup> and will be redeployed to a new location in 2019. 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 Galaxy 11 at 93.1° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 11 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Grant of this STA request is in the public interest because it will allow Intelsat to redeploy Galaxy 11 following the launch of, and transfer of traffic to Intelsat 38, thereby maximizing the use of on-orbit resources.

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<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01203, File No. SAT-MOD-20161004-00097 (Dec. 9, 2016) (Public Notice). Galaxy 25 will be relocated mid-2019.

<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01203, File No. SAT-MOD-20161004-00097 (Dec. 9, 2016) (Public Notice).

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

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers