

S2408 SAT-STA-20190205-00005 IB2019000244  
Intelsat License LLC  
Intelsat 904



File # SAT-STA-20190205-00005

Call Sign S2408 Grant Date 02/19/19  
(or other identifier)

Term Dates period of  
From 02/20/19 To: 30 days

Approved by OMB  
3060-0678

Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch

Date & Time Filed: Feb 5 2019 4:30:06:713PM  
File Number: SAT-STA-20190205-00005  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY  
FOR OFFICIAL USE ONLY


APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for Special Temporary Authority to Drift Intelsat 904 to 29.5 W.L.

I. Applicant

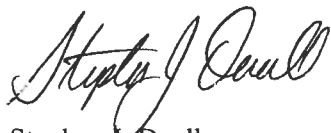
|                   |  |                      |                             |
|-------------------|--|----------------------|-----------------------------|
| <b>Name:</b>      | Intelsat License LLC                         | <b>Phone Number:</b> | 703-559-7848                |
| <b>DBA Name:</b>  |  | <b>Fax Number:</b>   | 703-559-8539                |
| <b>Street:</b>    | c/o Intelsat US LLC<br>7900 Tysons One Place | <b>E-Mail:</b>       | susan.crandall@intelsat.com |
| <b>City:</b>      | McLean                                       | <b>State:</b>        | VA                          |
| <b>Country:</b>   | USA  | <b>Zipcode:</b>      | 22102 -5972                 |
| <b>Attention:</b> | Susan H. Crandall                            |                      |                             |

**ATTACHMENT TO GRANT**  
**Intelsat License LLC**  
**IBFS File No. SAT–STA–20190205–00005**

|  |  |   |
|--|--|---|
| <b>IBFS File No(s):</b>  | SAT–STA–20190205–00005   | <p><b>GRANTED –<br/>With Conditions</b></p>  <p><b>International Bureau<br/>Satellite Division</b></p> |
| <b>Licensee/Grantee:</b>   | Intelsat License LLC   |   |
| <b>Call Sign:</b>  | S2408  |   |
| <b>Satellite Name:</b>   | Intelsat 904   |   |
| <b>Orbital Location:<br/>(required station-keeping tolerance)</b>  | 29.5° W.L.<br>(+/- 0.05 degrees east/west station keeping)   |   |
| <b>Administration:</b>   | United States of America   |   |
| <b>Nature of Service:</b>  | Telemetry, Tracking, and Command (TT&C)  |   |
| <b>Scope of Grant:</b>   | Special temporary authority for a period of 30 days to conduct TT&C operations necessary to drift the Intelsat 904 space station from the 45.1° E.L. orbital location to the 29.5° W.L. orbital location |   |
| <b>Service Area(s):</b>  | N/A  |   |
| <b>Frequencies:</b>  | TT&C center frequencies:<br>3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (space-to-Earth)<br>6173.7 MHz and 6176.3 MHz (Earth-to-space).   |   |
| <p><b>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission’s rules not waived herein. This grant is also subject to the following conditions:</b></p> <ol style="list-style-type: none"> <li>1. Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the Intelsat 904 space station must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.</li> <li>2. Intelsat must coordinate the operations of Intelsat 904 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 29.5° W.L. orbital location.</li> <li>3. While at the 29.5° W.L. orbital location, Intelsat must maintain the Intelsat 904 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.</li> <li>4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat’s own risk.</li> </ol> |  |   |
| <p>Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned. This action is taken pursuant to Section 0.261 of the Commission’s rules on delegated authority, 47 CFR § 0.261, and is effective upon release.</p> <p>Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).</p>  |  |   |
| <b>Action Date:</b>  | February 19, 2019  |   |
| <b>Term Dates</b>  | <b>From:</b> February 20, 2019   | <b>To:</b> period of 30 days  |

**ATTACHMENT TO GRANT**  
Intelsat License LLC  
IBFS File No. SAT-STA-20190205-00005

**Approved:**



Stephen J. Duall  
Chief, Satellite Policy Branch

2. Contact

|                   |                       |                      |                            |
|-------------------|-----------------------|----------------------|----------------------------|
| <b>Name:</b>      | Cynthia J. Grady      | <b>Phone Number:</b> | 703-559-6949               |
| <b>Company:</b>   | Intelsat US LLC       | <b>Fax Number:</b>   | 703-559-8539               |
| <b>Street:</b>    | 7900 Tysons One Place | <b>E-Mail:</b>       | cynthia.grady@intelsat.com |
| <b>City:</b>      | McLean                | <b>State:</b>        | VA                         |
| <b>Country:</b>   | USA                   | <b>Zipcode:</b>      | 22102 -5972                |
| <b>Attention:</b> |                       | <b>Relationship:</b> | Legal Counsel              |

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification    CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location                       Extend Expiration Date                       Other

6. Temporary Orbit Location  
29.5 W.L.

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests 30 days, commencing March 1, 2019, of Special Temporary Authority to drift Intelsat 904 (Call Sign S2408) from 45.1 E.L. to 29.5 W.L.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.  Yes  No

10. Name of Person Signing  
Cynthia J. Grady

11. Title of Person Signing  
Senior Counsel. Intelsat US LLC

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**



**INTELSAT.**

*Envision. Connect. Transform.*

February 5, 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 Intelsat 904 to 29.5° W.L.  
Call Sign: S2408

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 30 days, commencing March 1, 2019, of Special Temporary Authority (“STA”)<sup>1</sup> to drift Intelsat 904 (Call Sign S2408) from 45.1° E.L. to 29.5° W.L. Intelsat is relocating Intelsat 904 after the successful launch and arrival of Intelsat 38 at 45.0° E.L.<sup>2</sup> and will be filing an application to modify Intelsat 904’s license for this redeployment.

The Intelsat 904 satellite is currently operating at 45.1° E.L.<sup>3</sup> Subject to receipt of Federal Communications Commission (“FCC” or “Commission”) approval, the satellite will be relocated to 29.5° W.L. where it will replace Intelsat 901 (S2405).<sup>4</sup> The drift of Intelsat 904 is expected to begin after the successful transfer of traffic to Intelsat 38 and will take approximately six months.

During the drift of Intelsat 904 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

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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 *Policy Branch Information; Actions Taken*, Report No. SAT-01199, File No. SAT-MOD-20160805-00079 (Nov. 4, 2016) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01290, File No. SAT-MOD-20170831-00126 (Dec. 15, 2017) (Public Notice).

Ms. Marlene H. Dortch  
February 5, 2019  
Page 2

the relocation process. The TT&C frequencies are as follows: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (downlink); 6173.7 MHz and 6176.3 MHz (uplink).

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 collision with large debris or other operational space stations. Intelsat 904 will be temporarily collocated with Intelsat 901, before the planned relocation of Intelsat 901 in Q3 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 Intelsat 904 at 29.5° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 904 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 Intelsat 904 following the launch of, and transfer of traffic to, Intelsat 38, thereby maximizing the use of on-orbit resources.

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