

April 10, 2019

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

Re: Request for Special Temporary Authority for Intelsat 29e  
Call Sign S2913  
**Expedited Treatment Requested**

Dear Ms. Dortch:

Intelsat Licensee LLC (“Intelsat”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> herein requests Special Temporary Authority (“STA”)<sup>2</sup> for 30 days beginning immediately to operate the Intelsat 29e satellite (Call Sign S2913) outside of the +/- 0.05° East/West station-keeping box pursuant to a waiver of Section 25.210(j) of the Commission’s rules.<sup>3</sup> As Intelsat informed the International Bureau by e-mail last night, Intelsat 29e has left its station-keeping box after experiencing back-to-back anomalies.

Intelsat 29e is currently authorized to operate at the 50.0° W.L. orbital location.<sup>4</sup> On April 7, 2019, Intelsat 29e experienced a fuel leak that caused the satellite to lose earth lock. Intelsat was in the process of recovering earth lock when another anomaly of unknown origin occurred on April 9, 2019. Due to these back-to-back anomalies, the Intelsat 29e satellite is no longer responding to commands and has drifted outside of its authorized +/- 0.05° East/West station-keeping box. The communications payload is not transmitting; however, there are RF transmissions at the telemetry frequency.

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<sup>1</sup> 47 C.F.R. § 25.120.

<sup>2</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$980.00 filing fee electronically via the International Bureau’s Filing System.

<sup>3</sup> 47 C.F.R. § 25.210(j).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01212, File No. SAT-MOD-20160916-00091 (Jan. 27, 2017) (Public Notice).

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.<sup>5</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>6</sup> In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>7</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists in this case based on hardship. Due to the technical anomalies on the Intelsat 29e satellite, Intelsat is unable to comply with the requirements of Section 25.210(j) of the Commission's rules. Intelsat will, however, take all practicable steps to regain control of the satellite and avoid causing interference in doing so. Intelsat will be contacting operators of satellites that could be impacted by the current drift of the satellite.

Intelsat requests that the STA sought herein commence immediately. The sudden and unexplained anomalies were unforeseen and are the type of extraordinary event that makes grant of an STA on less than three working days' advance notice appropriate.<sup>8</sup>

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Jose Albuquerque  
Stephen Duall  
Kathryn Medley  
Karl Kensinger

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<sup>5</sup> 47 C.F.R. § 1.3.

<sup>6</sup> *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

<sup>7</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

<sup>8</sup> *See* 47 C.F.R. § 25.120(a).