

S2913 SAT-STA-20190410-00025 IB2019001054
Intelsat License LLC
Intelsat 29e



File # SAT-STA-20190410-00025

Call Sign S2913 Grant Date 04/10/19
(or other identifier)

Term Dates period of
From 04/10/19 To: 30 days

Approved by OMB
3060-0678

Approved: *Stephen J. Duall*
Stephen J. Duall
Chief, Satellite Policy Branch

Date & Time Filed: Apr 10 2019 11:24:35:486AM
File Number: SAT-STA-20190410-00025
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for 30-day Station-Keeping STA for Intelsat 29e (S2913)

I. Applicant

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

ATTACHMENT TO GRANT
Intelsat License LLC
IBFS File No. SAT-STA-20190410-00025

IBFS File No(s):	SAT-STA-20190410-00025	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2913	
Satellite Name:	Intelsat 29e	
Orbital Location: (required station-keeping tolerance)	See Scope of Grant	
Administration:	United States of America	
Nature of Service:	Telemetry, Tracking and Command (TT&C)	
Scope of Grant:	Special temporary authority for a period of 30 days for TT&C communications outside of the +/- 0.05° East-West station keeping box previously authorized for Intelsat 29e at 50.0° W.L. ¹	
Service Area(s):	n/a	
Frequencies:	<p>Command: 5850.5-5853.0 MHz and 6422.0-6424.5 MHz (Earth-to-space; selectable center frequencies in 100 kilohertz steps)</p> <p>Telemetry/Tracking: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, 3702.75 MHz (space-to-Earth)</p>	
<p>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:</p> <ol style="list-style-type: none"> 1. Intelsat is required to accept interference from other lawfully operating space stations or radio communications systems. 2. In the event of any harmful interference to other lawfully operating space stations or radio communications systems, Intelsat must inform the Commission, in writing, immediately of such an event. 3. Intelsat must notify the 18th Space Control Squadron (SPCPS) of the uncontrolled drift and the anticipated drift rate of Intelsat 29e. Intelsat must also notify operators with satellites in the path of Intelsat 29e of the uncontrolled drift. 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. 		
<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.</p> <p>This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.</p>		


¹ IBFS File No. SAT-MOD-20160916-00091 (granted Jan. 1, 26, 2017)

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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).

Action Date:	April 10, 2019	
Term Dates	From: April 10	To: period of 30 days

Approved:


Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact

Name:	Jennifer D. Hindin	Phone Number:	202-719-4975
Company:	Wiley Rein LLP	Fax Number:	
Street:	1776 K Street NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -
Attention:		Relationship:	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

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 requests 30-day STA beginning immediately to operate Intelsat 29e (S2913) outside of the station-keeping box.

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
Susan H. Crandall

11. Title of Person Signing
Associate General Counsel

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

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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.

April 10, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 License LLC (“Intelsat”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ herein requests Special Temporary Authority (“STA”)² 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.³ 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.⁴ 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.

¹ 47 C.F.R. § 25.120.

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

³ 47 C.F.R. § 25.210(j).

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

Intelsat US LLC

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Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ 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.⁷ 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.⁸

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 US LLC

cc: Jose Albuquerque
Stephen Duall
Kathryn Medley
Karl Kensinger

⁵ 47 C.F.R. § 1.3.

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

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

⁸ *See* 47 C.F.R. § 25.120(a).