



INTELSAT.

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April 10, 2019

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 Drift Galaxy 11 to 93.1° W.L., Call Sign: S2253

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Galaxy 11 (Call Sign S2253) from 44.9° E.L. to 93.1° W.L.² Intelsat currently has a pending application for this redeployment.³

The Galaxy 11 satellite is licensed permanently to operate at 44.9° E.L.⁴ Pursuant to STA, on March 5, 2019, the satellite began drifting to 93.1° W.L. Galaxy 11 will replace Galaxy 25 (Call Sign S2154)⁵ at 93.1° W.L. The drift of Galaxy 11 is expected to take approximately six months.

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-01373, File No. SAT-STA-20190204-00004 (Feb. 22, 2019) (Public Notice).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01374, File No. SAT-MOD-20181231-00095 (Mar. 1, 2019) (Public Notice).

⁴ 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).

⁵ 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.

Intelsat US LLC

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Ms. Marlene H. Dortch

April 10, 2019

Page 2

During the drift of Galaxy 11 Intelsat will continue to 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 extension request will not result in increased risk of harmful interference. As noted above, Intelsat will continue to 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.⁶ 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 extension request is in the public interest because it will allow Intelsat to continue to redeploy Galaxy 11 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 extension request. Please direct any questions regarding this request 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

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