



INTELSAT.

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April 11, 2019

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

Re: Request for Special Temporary Authority to Operate Intelsat 901 at 29.5° W.L. with New Frequencies; Call Sign: S2405

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing upon grant, to operate Intelsat 901 (S2405) in the communications frequencies 3625-3700 MHz and 5850-5925 MHz in order to provide additional capacity at 29.5° W.L. The proposed operations are expected to last approximately five months.

Intelsat 901 is permanently licensed to operate at 29.5° W.L. in the following bands: 3700-4200 MHz, 5925-6425 MHz, 10950-11200 MHz, and 11450-11700 MHz.² Intelsat is seeking additional authority to operate in 3625-3700 MHz and 5850-5925 MHz to provide additional capacity for customers.

Additionally, Intelsat is seeking to operate under No. 4.4 of the International Telecommunication Union (“ITU”) Radio Regulations. Intelsat has assessed the operational environment near 29.5° W.L. and there are currently no co-frequency operations in 3625-3700 MHz and 5850-5925 MHz within +/- 6 degrees. Intelsat’s proposed operation of Intelsat 901 will be on a non-interference, non-protection basis and will conform with the Federal Communications Commission’s rules governing operations vis-à-vis adjacent locations.

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-01290, File No. SAT-MOD-20170831-00126 (Dec. 15, 2017) (Public Notice). Although Intelsat 901 is capable of operating in the 3625-3700 MHz and 5850-5925 MHz bands, Intelsat did not originally seek authority to operate in these bands at 29.5° W.L.

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Later this year Intelsat will replace Intelsat 901 with Intelsat 904 (S2408) at 29.5° W.L. and will redeploy Intelsat 901.³ Intelsat is currently drifting Intelsat 904 to 29.5° W.L. and the spacecraft is expected to arrive at 29.5° W.L. approximately five months.⁴ In the permanent modification Intelsat will be filing to support the redeployment of Intelsat 904, Intelsat will request that a new U.S. ITU filing be made at 29.5° W.L. for operations in the 3625-3700 MHz and 5850-5925 MHz bands.

The temporary operation of Intelsat 901 in the 3625-3700 MHz and 5850-5925 MHz bands will help provide additional capacity for customers at the nominal 29.5° W.L. location. Accordingly, grant of this STA request is in the public interest.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01374, File No. SAT-MOD-20190207-00009 (Mar. 1, 2019) (Public Notice).

⁴ See *Intelsat License LLC, Request for Extension of Special Temporary Authority to Drift Intelsat 904 to 29.5 W.L.*, File No. SAT-STA-20190318-00016 (filed Mar. 18, 2019); *Policy Branch Information; Actions Taken*, Report No. SAT-01373, File No. SAT-STA-20190205-00005 (Feb. 22, 2019) (Public Notice).