



**INTELSAT.**

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May 2, 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 Galaxy 25 to 32.9° E.L.  
Call Sign: S2154

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 60 days, commencing June 1, 2019, of Special Temporary Authority (“STA”)<sup>1</sup> to drift Galaxy 25 (Call Sign S2154) from 93.10° W.L. to 32.9° E.L. Intelsat intends to file an application to modify Galaxy 25’s license for this redeployment.

The Galaxy 25 satellite is currently operating at 93.10° W.L.<sup>2</sup> Subject to receipt of Federal Communications Commission (“FCC” or “Commission”) approval, the satellite will be relocated to 32.9° E.L. The drift of Galaxy 25 is expected to begin June 1, 2019 and will take approximately four months.

During the drift of Galaxy 25, 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 the relocation process. The TT&C frequencies are as follows: 4195.5 MHz and 4199.5 (downlink); 5926.5 MHz and 6423.5 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

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

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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 is not aware of any FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 25 at 32.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 25 that is the subject of an International Telecommunication Union (“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 provide new capacity from the 32.9° E.L. orbital location.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA 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