



July 17, 2019

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

Re: Request for Further Extension of Special Temporary Authority to Drift Intelsat 904 to 29.5° W.L., Call Sign: S2408

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 904 (Call Sign S2408) from 45.1° E.L. to 29.5° W.L.<sup>2</sup> Intelsat is relocating Intelsat 904 after the successful launch and arrival of Intelsat 38 at 45.0° E.L.<sup>3</sup> and has a pending application to modify Intelsat 904’s license for this redeployment.<sup>4</sup> The drift of Intelsat 904 is expected to take approximately six months.

During the drift of Intelsat 904 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: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (downlink); 6173.7 MHz and 6176.3 MHz (uplink).

Grant of this STA further 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

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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, e.g., *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01394, File No. SAT-STA-20190515-00038 (May 31, 2019) (Public Notice).

<sup>3</sup> Intelsat 38 is a Ku-band satellite authorized by Azerbaijan and is also known as Azerspace-2.

<sup>4</sup> See *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01390, File No. SAT-MOD-20190422-00031 (May 17, 2019) (Public Notice).

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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 collision with large debris or other operational space stations. Intelsat 904 will be temporarily collocated with Intelsat 901, before the planned relocation of Intelsat 901 in Q3 2019. Intelsat is not aware of any other Federal Communications Commission (“FCC” or “Commission”) licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 904 at 29.5° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 904 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue with redeploying Intelsat 904 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 further extension request. Please direct any questions regarding this supplement 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