

S2408 SAT-STA-20190717-00064 IB2019002728
Intelsat License LLC
Intelsat 904



File # SAT-STA-20190717-00064
Call Sign S2408 Grant Date 07/25/19
(or other identifier)
Term Dates period of
From 07/21/19 To: 60 days
Approved: *Stephen J. Duell*

Approved by OMB
3060-0678

Date & Time Filed: Jul 17 2019 5:01:06:213PM
File Number: SAT-STA-20190717-00064
Callsign:

* with conditions

Stephen J. Duell
Chief, Satellite Policy Branch

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
FOR OFFICIAL USE ONLY


APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Further Extension of Special Temporary Authority to Drift Intelsat 904 to 29.5 W.L.

1. Applicant

Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA Name:		Fax Number:	703-559-8539
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-20190717-00064

IBFS File No(s):	SAT-STA-20190717-00064	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2408	
Satellite Name:	Intelsat 904	
Orbital Location: (required station-keeping tolerance)	29.5° W.L. (+/- 0.05 degrees east/west station keeping)	
Administration:	United States of America	
Nature of Service:	Telemetry, Tracking, and Command (TT&C)	
Scope of Grant:	Special temporary authority for a period of 60 days to continue to conduct TT&C operations necessary to drift the Intelsat 904 space station from the 45.1° E.L. orbital location to the 29.5° W.L. orbital location	
Service Area(s):	N/A	
Frequencies:	TT&C center frequencies: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (space-to-Earth) 6173.7 MHz and 6176.3 MHz (Earth-to-space).	
<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. Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the Intelsat 904 space station must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event. 2. Intelsat must coordinate the operations of Intelsat 904 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 29.5° W.L. orbital location. 3. While at the 29.5° W.L. orbital location, Intelsat must maintain the Intelsat 904 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees. 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. This action is taken pursuant to Section 0.261 of the Commission’s rules on delegated authority, 47 CFR § 0.261, and is effective upon release.</p> <p>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).</p>		
Action Date:	July 25, 2019	
Term Dates	From: July 21, 2019	To: period of 60 days

ATTACHMENT TO GRANT
Intelsat License LLC
IBFS File No. SAT-STA-20190717-00064

Approved:



Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact

Name:	Cynthia J. Grady	Phone Number:	703-559-6949
Company:	Intelsat US LLC	Fax Number:	703-559-8539
Street:	7900 Tysons One Place	E-Mail:	cynthia.grady@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
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
29.5 W.L.

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 License LLC herein requests an additional 60 days of Special Temporary Authority previously granted Intelsat to drift Intelsat 904 (Call Sign S2408) from 45.1 E.L. to 29.5 W.L.

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
Cynthia J. Grady

11. Title of Person Signing
Senior Counsel, Intelsat US LLC

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

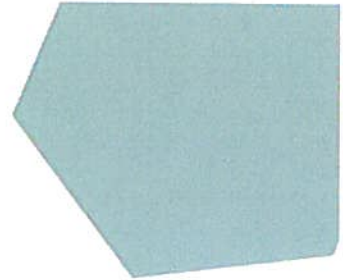
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

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.



July 17, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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”)¹ previously granted Intelsat to drift Intelsat 904 (Call Sign S2408) from 45.1° E.L. to 29.5° W.L.² Intelsat is relocating Intelsat 904 after the successful launch and arrival of Intelsat 38 at 45.0° E.L.³ and has a pending application to modify Intelsat 904’s license for this redeployment.⁴ 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

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

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

⁴ 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).



Ms. Marlene H. Dortch
July 17, 2019
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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