



August 12, 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 Operate Intelsat 901 at 29.5° W.L. with New Frequencies; Call Sign: S2405

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat to operate Intelsat 901 (Call Sign S2405) in the communications frequencies 3625-3700 MHz and 5850-5925 MHz in order to provide additional capacity at 29.5° W.L.² The operations are expected to continue until Intelsat 901 redeploys to 97.5° W.L.³

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, 11450-11700 MHz, and 14000-14500 MHz.⁴ Intelsat is seeking authority to continue to operate in 3625-3700 MHz and 5850-5925 MHz. This will allow Intelsat to continue serving customers in these frequency bands.

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-01402, File No. SAT-STA-20190711-00060 (July 19, 2019) (Public Notice).

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (June 21, 2019) (Public Notice).

⁴ See *Satellite 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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Additionally, Intelsat is seeking to continue to operate under No. 4.4 of the International Telecommunication Union (“ITU”) Radio Regulations.⁵ 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 continued operation of Intelsat 901 will be on a non-interference, non-protection basis and will conform with the Federal Communications Commission’s (“Commission”) rules governing operations vis-à-vis adjacent locations.

Later this year Intelsat will replace Intelsat 901 with Intelsat 904 (Call Sign S2408) at 29.5° W.L. and will redeploy Intelsat 901. Intelsat is currently drifting Intelsat 904 to 29.5° W.L. and the spacecraft is expected to arrive at 29.5° W.L. in approximately three months.⁶

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 further STA extension request is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this further STA extension request. Please direct any questions regarding this request to (703) 559-6949.

Respectfully submitted,

/s/ *Cynthia J. Grady*

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁵ The U.S. submitted an ITU filing on Intelsat’s behalf in April 2019, which has been designated USASAT-55P. *See generally Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (August 2, 2019) (Public Notice) (requesting 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).

⁶ *See, e.g., Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01404, File No. SAT-STA-20190717-00064 (July 26, 2019) (Public Notice); *see also Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (August 2, 2019) (Public Notice).