

** GRANTED IN PART / DENIED IN PART **



File # SAT-STA-20190820-00078

Call Sign S3023 Grant Date 09/18/19
(or other identifier)

Term Dates period of
From 09/20/19 To: 30 days

Approved by OMB
3060-0678

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

Date & Time Filed: Aug 20 2019 3:08:41:440PM
File Number: SAT-STA-20190820-00078
Callsign:

*with condition

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority to Conduct IOT and Operate Intelsat 39 at 61.95 E.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–20190820-00078

IBFS File No(s):	SAT-STA-20190820-00078	<p>GRANT IN / DENY IN PART – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S3023	
Satellite Name:	Intelsat 39	
Orbital Location: (required station- keeping tolerance)	61.95° E.L. (+/-0.05 degrees east/west)	
Administration:	United States of America	
Nature of Service:	Fixed-Satellite Service (FSS)	
Scope of Grant:	Special temporary authority for a period of 30 days ¹ to: (1) conduct in-orbit testing (IOT) of Intelsat 39 at the 61.95° E.L. orbital location; and (2) operate Intelsat 39 at the 61.95° E.L. orbital location. ²	
Service Area(s):	Not Applicable	
Frequencies:	IOT Payload testing frequencies: 10.95-11.2 GHz (space-to-Earth) 14.0-14.25 GHz (Earth-to-space) On station frequencies: 3625-4200 MHz (space-to-Earth) 5850-6425 MHz (Earth-to-space) 10.7-11.7 GHz (space-to-Earth) 12.25-12.75 GHz (space-to-Earth) 13.0-13.25 GHz (Earth-to-space) 13.75-14.5 GHz (Earth-to-space) Telemetry, Tracking and Control frequencies: 3948.5 MHz, 3949.0 MHz, 3951.0 MHz, 3953.0 MHz, and 3953.5 MHz (space-to-Earth); and 6174.7 MHz and 6177.3 MHz (Earth-to-space)	
<p>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>		

¹ Intelsat requested a grant of 60-days special temporary authority, which is permissible without public notice pursuant to section 25.120(b)(3) of the Commission’s rules. Under this rule, the Commission “may” grant a temporary authorization for a period not to exceed 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. Although Intelsat states that it will file a license modification for the service requested, we find that the public interest in notice and comment supports a grant for a shorter period of time where there is no evidence of why a request for regular authority that provides more complete details of the proposed operations and an opportunity for public comment could not be filed simultaneously with the request for special temporary authority. Accordingly, we deny Intelsat’s request for special temporary authority for 60 days and instead grant special temporary authority for a period of 30 days, which is permissible without public notice under section 25.120(b)(4) of the Commission’s rules.

² Intelsat previously received special temporary authority to perform IOT of Intelsat 39 at the 55.3° E.L. and 62.0° E.L. orbital locations and drift authority to 62.0° E.L. See IBFS File No. SAT-STA-20190715-00061. Intelsat will no longer perform IOT of Intelsat 39 at 62.0° E.L. See Letter from Cynthia J. Grady, Senior Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, at 1, n.2 (dated Aug. 20, 2019) (*August 2019 Letter*).

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1. All operations under this grant of special temporary authority must be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station.
2. In the event of any harmful interference under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference and must inform the Commission, in writing, immediately of such an event.
3. Intelsat must coordinate the operations of Intelsat 39 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 61.95° E.L. orbital location.
4. During in-orbit testing, Intelsat must maintain the Intelsat 39 space station within an east-west longitudinal station-keeping tolerance of ± 0.05 degrees of the 61.95° E.L. orbital location.
5. IOT and FSS operations for Intelsat 39 must comply with the conditions imposed in IBFS File No. SAT-LOA-20171205-00164.³

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 C.F.R. § 0.261, and is effective upon release.

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).

Action Date:	September 18, 2019	
Term Dates	From: September 20, 2019	To: period of 30 days

Approved:


 Stephen J. Duall
 Chief, Satellite Policy Branch

³ See Application for Authority to Launch and Operate Intelsat 39, a Replacement Satellite With New Frequencies, at 62.0° E.L., IBFS File No SAT-LOA-20171205-00164 (Grant stamp, June 26, 2018) (*June 2018 Grant*). As part of its STA request, Intelsat has requested to waive Condition 19 of the *June 2018 Grant*, which requires Intelsat 39 to begin providing service at the 62.0° E.L. orbital location before the satellite it is replacing, Intelsat 902, discontinues services there. *August 2019 Letter*, at 1-2 n.5 (citing IBFS File No. SAT-LOA-20171205-00164). We find that waiver is not needed in this instance, because that condition is designed to deter warehousing and Intelsat 39’s move to the 61.95° E.L. orbital location does not raise warehousing concerns since Intelsat will provide the same service at 61.95° E.L. as it would have at 62.0° E.L.

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
61.95 E.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 a grant of Special Temporary Authority for 60 days, beginning September 20, 2019, to conduct in-orbit testing of the Intelsat 39 satellite at 61.95 E.L. and to operate Intelsat 39 at 61.95 E.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).

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INTELSAT.

Envision. Connect. Transform.

August 20, 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 Conduct In-Orbit Testing and Operate the
Intelsat 39 Satellite at 61.95° E.L.; Call Sign S3023

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 60 days, beginning September 20, 2019, to conduct in-orbit testing (“IOT”) of the Intelsat 39 (Call Sign S3023) satellite at 61.95° E.L.;² and to operate Intelsat 39 at 61.95° E.L. The IOT at 61.95° E.L. is expected to last approximately 20 days. Intelsat will be filing an application to support permanent operation of Intelsat 39 at 61.95° E.L.

Intelsat 39 was successfully launched on August 6, 2019. Intelsat expects to begin IOT for part of the satellite payload at 55.3° E.L. by the end of August.³ After completing IOT at 55.3° E.L., and subject to Federal Communications Commission (“FCC” or “Commission”) authorization, Intelsat will drift Intelsat 39 to 61.95° E.L. and complete IOT.⁴ Once IOT at 61.95° E.L. is complete, Intelsat will transfer traffic from Intelsat 902 (Call Sign S2406) to Intelsat 39.⁵

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 Intelsat will no longer be performing IOT of Intelsat 39 at 62.0° E.L. *See Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-STA-20190715-00061 (Aug. 2, 2019) (authorizing the IOT of Intelsat 39 at 55.3° E.L., the drift of the satellite from 55.3° E.L. to 62.0° E.L., and further IOT at 62.0° E.L.) (“55.3° E.L. STA”).

³ *See id.*

⁴ Intelsat will drift to 61.95° E.L. under the authority granted in the 55.3° E.L. STA. *See id.*

⁵ Out of an abundance of caution, and to the extent necessary, Intelsat requests a waiver of Condition 19 of the Intelsat 39 grant, which requires that Intelsat 902 continue providing service from 62.0° E.L. in the 3625-4200 MHz, 10.95-11.2 GHz, and 11.45-11.7 GHz frequency bands until

Intelsat 39 IOT payload testing at 61.95° E.L. will be performed in the following frequency bands:

- 10950-11200 MHz (space-to-Earth) and
- 14000-14250 MHz (Earth-to-space).

On station at 61.95° E.L. Intelsat 39 will operate in the following frequency bands:

- 3625-4200 MHz (space-to-Earth);
- 5850-6425 MHz (Earth-to-space);
- 10700-11700 MHz (space-to-Earth);
- 12250-12750 MHz (space-to-Earth);
- 13000-13250 MHz (Earth-to-space); and
- 13750-14500 MHz (Earth-to-space).

Telemetry, Tracking, and Command (“TT&C”) services on-station at 61.95° E.L. will be performed in the following center frequencies: 3948.5 MHz, 3949.0 MHz, 3951.0 MHz, 3953.0 MHz, and 3953.5 MHz (space-to-Earth); and 6174.7 MHz and 6177.3 MHz (Earth-to-space).⁶

In support of its request, Intelsat submits the following information.

During the IOT of Intelsat 39 at 61.95° E.L., Intelsat will operate in the above referenced Ku-bands. Intelsat has identified the operational satellites within +/-6 degrees of 61.95° E.L and has completed

Intelsat 39 begins providing services at 62.0° E.L. *See* Intelsat License LLC Application for Authority to Launch and Operate Intelsat 39, a Replacement Satellite with New Frequencies, File No. SAT-LOA-20171205-00164 (Condition 19, stamp grant issued June 26, 2018 by Stephen J. Duall). As noted above, Intelsat is seeking to modify the Intelsat 39 license to allow permanent operation of the satellite at 61.95° E.L. Waiver of Condition 19 will allow the redeployment of Intelsat 902 once the customers on the satellite have been transitioned onto Intelsat 39, regardless of whether the Intelsat 39 license modification has been granted at the time of redeployment. This accommodation prior to the commencement of operations on Intelsat 39 ensures uninterrupted customer service at the nominal 62.0° E.L. and the efficient use of on-orbit assets. Grant of the requested waiver is therefore in the public interest. Further, the FCC has previously found waiver of this condition unnecessary for a similar redeployment. *See* Intelsat License LLC Application for Special Temporary Authority to Drift Intelsat 805 (S2404) to, and Operate at, 169.1° E.L., File No. SAT-STA-20180719-00054 (Condition 1 at note 1, stamp grant issued Aug. 1, 2018 by Stephen J. Duall).

⁶ Intelsat 39 is equipped with a tunable command receiver which allows Intelsat to tune the center frequencies within 6154.5-6195.5 MHz in 100 kHz steps. Intelsat seeks authority to utilize this tunable range on-station at 61.95° E.L.

Ms. Marlene H. Dortch
August 20, 2019
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coordination with any potentially affected operators. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 at 61.95° E.L. With the exception of Intelsat 902, which operates at 62.0° E.L.,⁷ Intelsat 39 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite at 61.95° E.L. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the Commission, having an overlapping station-keeping volume with Intelsat 39 at 61.95° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 39 at 61.95° E.L. that is the subject of an International Telecommunications Union filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 39 is a critical step in ensuring that the satellite will be fully operational at 61.95° E.L. This, in turn, will allow Intelsat to provide continuity of service to customers at the nominal 62° E.L. location, and thereby promotes the public interest.

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

⁷ The station-keeping volume of Intelsat 902 and Intelsat 39 will overlap until such time as Intelsat 902 is redeployed. *See Policy Branch Information, Actions Taken*, Report No. SAT-01199, File No. SAT-MOD-20160816-00084 (Public Notice) (Nov. 4, 2016).