

**** GRANT IN PART / DENY IN PART ****

S2380 **SAT-STA-20190912-00092** **IB2019003264**
Intelsat License LLC
Intelsat 9



File # SAT-STA-20190912-00092

Call Sign S2380 **Grant Date** 09/25/19
(or other identifier)

Term Dates period of
From 10/01/19 **To:** 30 days

Approved by OMB
3060-0678

Approved: *Stephen J. Duall*
Stephen J. Duall
Chief, Satellite Policy Branch

*** with conditions**

Date & Time Filed: Sep 12 2019 6:07:13:676PM
File Number: SAT-STA-20190912-00092
Callsign:

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 Drift Intelsat 9 to 50.0 W.L., Call Sign S2380

I. 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–20190912-00092

IBFS File No(s):	SAT–STA–20190912–00092	GRANTED IN PART / DENIED IN PART– With Conditions  International Bureau Satellite Division
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2380	
Satellite Name:	Intelsat 9	
Orbital Location: (required station- keeping tolerance)	50.0° 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 30 days to conduct TT&C operations necessary to drift Intelsat 9 from the 66.15° E.L. orbital location to the 50.0° W.L. orbital location. ¹	
Service Area(s):	N/A	
Frequencies:	TT&C center frequencies: 11.7005 GHz; 11.7020 GHz (space-to-Earth) 14.0005 GHz; 14.4945 GHz (Earth-to-space)	
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:		
<div><div>1.</div><div>Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the Intelsat 9 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.</div></div> <div><div>2.</div><div>Intelsat must coordinate the operations of Intelsat 9 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 50.0° W.L. orbital location.</div></div> <div><div>3.</div><div>Intelsat must operate only the TT&C frequencies authorized for Intelsat 9 during the space station’s drift to the 50.0° W.L. orbital location.</div></div> <div><div>4.</div><div>Intelsat must continue to comply with the grant conditions set forth in IBFS File No. SAT-MOD-20180305-00019.</div></div> <div><div>5.</div><div>Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat’s own risk.</div></div>		
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.		

¹ Intelsat requested a grant of 60-days for 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.

ATTACHMENT TO GRANT
Intelsat License LLC
IBFS File No. SAT–STA–20190912-00092


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.

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 25, 2019
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Term Dates	From: October 1, 2019	To: period of 30 days
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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

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 60 days, commencing October 1, 2019, of Special Temporary Authority to drift Intelsat 9 (Call Sign S2380) from 66.15 E.L. to 50.0 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

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

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.

September 12, 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 Drift Intelsat 9 to 50.0° W.L.
Call Sign: S2380

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 60 days, commencing October 1, 2019, of Special Temporary Authority (“STA”)¹ to drift Intelsat 9 (Call Sign S2380) from 66.15° E.L. to 50.0° W.L. Intelsat intends to file an application shortly to modify the Intelsat 9 satellite license for this redeployment.

The Intelsat 9 satellite is currently operating in inclined orbit at 66.15° E.L.² Subject to receipt of Federal Communications Commission (“FCC” or “Commission”) approval, the satellite will be relocated to 50.0° W.L. The drift of Intelsat 9 is expected to begin October 1, 2019 and will take approximately eight months.

During the drift of Intelsat 9, 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: 14.0005 GHz and 14.4945 GHz in the uplink, and 11.7005 GHz and 11.7020 GHz in the downlink.

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

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 *Policy Branch Information, Actions Taken*, Report No. SAT-01332, File No. SAT-MOD-20180305-00019 (July 20, 2018) (Public Notice).

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 Intelsat 9 at 50.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 9 that is the subject of an International Telecommunication Union 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 service at the 50.0° W.L. orbital location after the loss of Intelsat 29e.

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