



**INTELSAT.**

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September 13, 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 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”)<sup>1</sup> 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.<sup>2</sup> The operations are expected to continue until Intelsat 901 redeploys to 97.5° W.L.<sup>3</sup>

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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 Request for Further Extension of Special Temporary Authority to Operate Intelsat 901 at 29.5° W.L. with New Frequencies, File No. SAT-STA-20190812-00073, Call Sign S2405 (stamp grant Sept. 12, 2019 by Stephen J. Duall). Pursuant to Section 1.62 of the Commission’s rules, Intelsat will continue to operate pursuant to the terms and conditions of its existing STA pending action on this renewal request. See 47 C.F.R. § 1.62.

<sup>3</sup> See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009, Call Sign S2405 (June 21, 2019) (Public Notice). Intelsat 904 (Call Sign S2408) recently arrived at 29.5° W.L. and Intelsat expects to redeploy Intelsat 901 in Q4 2019. See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031, Call Sign S2408 (August 2, 2019) (Public Notice) (authorizing Intelsat 904 to operate at 29.5° W.L.).

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.<sup>4</sup> Intelsat is seeking authority to continue to operate in the 3625-3700 MHz and 5850-5925 MHz frequency bands in order to continue serving customers in these bands.

Intelsat's continued operation of Intelsat 901 in 3625-3700 MHz and 5850-5925 MHz 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.<sup>5</sup>

The temporary operation of Intelsat 901 in the 3625-3700 MHz and 5850-5925 MHz bands provides 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

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<sup>4</sup> See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01290, File No. SAT-MOD-20170831-00126, Call Sign S2405 (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.

<sup>5</sup> Intelsat no longer seeks to operate under No. 4.4 of the International Telecommunication Union ("ITU") Radio Regulations. The U.S. submitted an ITU filing on Intelsat's behalf in April 2019, which has been designated USASAT-55P.