

September 18, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Request for Extension of Special Temporary Authority to Conduct In-Orbit Testing of the Intelsat 39 Satellite; Call Sign S3023

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<sup>2</sup> to conduct in-orbit testing (“IOT”) of the Intelsat 39 satellite at 55.3° E.L. and to drift the satellite to 62.0° E.L.<sup>3</sup> Intelsat 39 was launched on August 6, 2019. The IOT and drift are expected to last approximately 60 days.

Intelsat 39 IOT payload testing will continue to be performed in the following frequency bands:

- 3625-4200 MHz, 10700-11700 MHz and 12250-12750 MHz (space-to-Earth); and
- 5850-6425 MHz, 13000-13250 MHz, and 13750-14500 MHz (Earth-to-space).<sup>4</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 *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-STA-20190715-00061 (Aug. 2, 2019) (Public Notice).

<sup>3</sup> The prior STA sought authority to conduct IOT at 62.0° E.L. *Id.* Intelsat is seeking to change the second IOT location and final location of Intelsat 39 by .05° to 61.95° E.L. See Intelsat License LLC’s Request for Special Temporary Authority to Conduct In-Orbit Testing and Operate the Intelsat 39 Satellite at 61.95° E.L., File No. SAT-STA-20190820-00078 (filed August 20, 2019). Intelsat will be filing an application to support permanent operation of Intelsat 39 at 61.95° E.L.

<sup>4</sup> IOT payload testing of 3625-4200 MHz, 10700-10950 MHz, 11200-11450 MHz, 11450-11700 MHz and 12250-12750 MHz will occur at 55.3° E.L. and IOT payload testing of 10950-11200 MHz and 14000-14250 MHz will occur at 61.95° E.L. See *id.*

Telemetry, Tracking, and Command (“TT&C”) services during IOT and drift will continue to 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).

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

During the IOT of Intelsat 39, Intelsat will continue to operate in the above referenced C- and Ku-bands. Intelsat has identified the operational satellites within +/-6 degrees of both IOT locations and has completed coordination with all potentially affected satellites. 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 during IOT at 55.3° E.L. 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. Further, Intelsat is not aware of any other Federal Communications Commission (“Commission”) licensed system, or any other system applied for and under consideration by the Commission, having an overlapping station-keeping volume with Intelsat 39 at 55.3° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 39 at 55.3° 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 provide continuity of service to customers at the nominal 62.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers