

S3023 SAT-STA-20190918-00096 IB2019003310  
Intelsat License LLC  
Intelsat 39



\*with conditions

File # SAT- STA- 20190918- 00096

Call Sign S3023 Grant Date 10/10/19

(or other identifier)

Term Dates period of

From 09/23/19

To: 30 days

Approved:

*Stephen J. Duall*

Stephen J. Duall

Chief, Satellite Policy Branch

Approved by OMB  
3060-0678

Date & Time Filed: Sep 18 2019 12:06:38:846PM  
File Number: SAT-STA-20190918-00096  
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 Extension of Special Temporary Authority to Conduct In-orbit Testing of the Intelsat 39 Satellite (Call Sign S3023)


I. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	c/o Intelsat US LLC 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall		

**ATTACHMENT TO GRANT**

Intelsat License LLC

IBFS File No. SAT–STA–20190918–00096

<b>IBFS File No(s):</b>	SAT–STA–20190918–00096 <sup>1</sup>	<p align="center"><b>GRANTED – With Conditions</b></p>  <p align="center"><b>International Bureau Satellite Division</b></p>
<b>Licensee/Grantee:</b>	Intelsat License LLC	
<b>Call Sign:</b>	S3023	
<b>Satellite Name:</b>	Intelsat 39	
<b>Orbital Location: (required station-keeping tolerance)</b>	55.3° E.L./ 61.95° E.L. (+/-0.05 degrees east/west)	
<b>Administration:</b>	United States of America	
<b>Nature of Service:</b>	Fixed-Satellite Service (FSS)	
<b>Scope of Grant:</b>	Special temporary authority for a period of 30 days to: (1) conduct in-orbit testing (IOT) of Intelsat 39 at the 55.3° E.L. orbital location; and (2) perform Telemetry, Tracking, and Command (TT&C) operations necessary to maintain Intelsat 39 at 55.3° E.L. and drift Intelsat 39 to 61.95° E.L. upon completion of IOT. <sup>2</sup>	
<b>Service Area(s):</b>	Not Applicable	
<b>Frequencies:</b>	Payload testing 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) <sup>3</sup>  TT&C 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><b>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:</b></p> <p>1. All operations under this grant of special temporary authority must be on an unprotected and non-harmful interference basis, <i>i.e.</i>, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station.</p>		

<sup>1</sup> Intelsat supplemented its application by specifying that Intelsat 39 will drift to the 61.95° E.L. orbital location, instead of the 62.0° E.L. orbital location. See Letter from Cynthia J. Grady, Senior Counsel to Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, IBFS File No. SAT–STA–20190918–00096 (filed September 27, 2019).

<sup>2</sup> Intelsat recently received Special Temporary Authority (STA), to conduct IOT with, and operate, Intelsat 39 at the 61.95° E.L. orbital location instead of Intelsat 39’s currently authorized orbital location of 62.0° E.L. See IBFS File No. SAT-STA-20190820-00078. However, that STA did not include drift authority because, at that time, Intelsat 39 already had a 30-day STA to drift to the 62.0° E.L. orbital location. See IBFS File No. SAT-STA-20190715-00061. The STA to drift to 62.0° E.L. thus covered Intelsat’s ability to drift to 61.95° E.L., until the STA recently expired. This grant authorizes, among other things, continued drift authority of Intelsat 39 to the new 61.95° E.L orbital location.

<sup>3</sup> IOT payload testing of 3625-4200 MHz, 5850-6425 MHz, 10.7-10.95 GHz, 11.2-11.45 GHz, 11.45-11.7 GHz, 12.25-12.75 GHz, 13.0-13.25 GHz, 13.75-14.0 GHz, and 14.25-14.5 GHz has occurred at 55.3° E.L. and IOT payload testing of 10.95-11.2 GHz and 14.0-14.25 GHz will occur at 61.95° E.L. See Letter from Cynthia J. Grady, Senior Counsel to Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, IBFS File No. SAT–STA–20190918–00096 (filed October 4, 2019).

**ATTACHMENT TO GRANT**  
 Intelsat License LLC  
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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 55.3° E.L. orbital location or during drift from the 55.3° E.L. orbital location to the 61.95° E.L. orbital location.
4. Intelsat 39’s operations at the 55.3° E.L. orbital location must be limited to IOT and must not include the provision of commercial services.
5. Intelsat must operate only the TT&C frequencies on Intelsat 39 during the space station’s drift from the 55.3° E.L. orbital location to the 61.95° E.L. orbital location.
6. 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 55.3° E.L. and 61.95° E.L. orbital locations.
7. IOT operations for Intelsat 39 must comply with the conditions imposed in IBFS File No. SAT-LOA-20171205-00164.<sup>4</sup>

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).

<b>Action Date:</b>	October 10, 2019	
<b>Term Dates</b>	<b>From:</b> September 23, 2019	<b>To:</b> period of 30 days

**Approved:**

  
 Stephen J. Duall  
 Chief, Satellite Policy Branch

<sup>4</sup> 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).

2. Contact

<b>Name:</b>	Cynthia J. Grady	<b>Phone Number:</b>	703-559-6949
<b>Company:</b>	Intelsat US LLC	<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	7900 Tysons One Place	<b>E-Mail:</b>	cynthia.grady@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>		<b>Relationship:</b>	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 an additional 30 days of Special Temporary Authority previously granted to Intelsat to conduct in-orbit testing of the Intelsat 39 satellite at 55.3 E.L. and to drift the satellite to 62.0 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).

**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-PERM, 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](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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**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 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