



INTELSAT.

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September 25, 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 180 days, commencing upon grant, of Special Temporary Authority (“STA”)¹ to drift Intelsat 9 (Call Sign S2380) from 66.15° E.L. to 50.0° W.L.² 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.³ 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.

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 has also filed a 60-day request to support the redeployment of Intelsat 9. *See* Intelsat License LLC’s Request for Special Temporary Authority to Drift Intelsat 9 to 50.0° W.L., File No. SAT-STA-20190912-00092 (filed September 12, 2019).

³ *See Policy Branch Information, Actions Taken*, Report No. SAT-01332, File No. SAT-MOD-20180305-00019 (July 20, 2018) (Public Notice).

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 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