



INTELSAT.

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November 14, 2019

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

Re: Request for Further Extension of Special Temporary Authority to Operate the IntelSat 39 Satellite at 61.95° E.L.; Call Sign S3023

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)¹ previously granted to IntelSat to operate IntelSat 39 at 61.95° E.L.² IntelSat has filed an application to support permanent operation of IntelSat 39 at 61.95° E.L.³

IntelSat 39 was successfully launched on August 6, 2019. After completing IOT at 55.3° E.L., IntelSat drifted IntelSat 39 to 61.95° E.L. where it completed IOT and commenced providing service.

On station at 61.95° E.L. IntelSat 39 will continue to operate in the following frequency bands:

- 3625-4200 MHz (space-to-Earth);
- 5850-6425 MHz (Earth-to-space);
- 10700-11700 MHz (space-to-Earth);
- 12250-12750 MHz (space-to-Earth);
- 13000-13250 MHz (Earth-to-space); and
- 13750-14500 MHz (Earth-to-space).

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, e.g., *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01425, File No. SAT-STA-20191015-00114 (Nov. 1, 2019) (Public Notice). Prior STA requests also included a request for in-orbit testing, which has since been completed.

³ See IntelSat License LLC Application for Modification of Authorization to Operate IntelSat 39 (S3023) at 61.95 E.L., File No. SAT-MOD-20191024-00119 (filed Oct. 24, 2019).

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Telemetry, Tracking, and Command services on-station at 61.95° E.L. 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).⁴

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

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 at 61.95° E.L. With the exception of Intelsat 902, which operates at 62.0° E.L.,⁵ 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 at 61.95° E.L. 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 61.95° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 39 at 61.95° E.L. that is the subject of an International Telecommunications Union filing and that is either in orbit or progressing towards launch.

The continued operation of Intelsat 39 allows Intelsat to provide continuity of service to customers at the nominal 62° E.L. location, and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this 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
Jennifer Balatan

⁴ Intelsat 39 is equipped with a tunable command receiver which allows Intelsat to tune the center frequencies within 6154.5-6195.5 MHz in 100 kHz steps. Intelsat seeks authority to utilize this tunable range on-station at 61.95° E.L.

⁵ The station-keeping volume of Intelsat 902 (S2406) and Intelsat 39 will overlap until such time as Intelsat 902 is redeployed. *See Policy Branch Information, Actions Taken*, Report No. SAT-01199, File No. SAT-MOD-20160816-00084 (Public Notice) (Nov. 4, 2016).