



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 Special Temporary Authority to Drift Intelsat 902 to, and Operate at, 309.9° E.L.; Call Sign: S2406

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to drift Intelsat 902 (Call Sign S2406) to, and operate at, 309.9° E.L. (50.1° W.L). Intelsat recently filed a request for 30 days of STA to support the drift of Intelsat 902² and will be filing an application to modify the Intelsat 902 satellite license in support of this redeployment.

The Intelsat 902 satellite is currently operating in inclined orbit at 62.0° E.L.,³ and upon receipt of Federal Communications Commission (“FCC” or “Commission”) approval, Intelsat 902 will be relocated to 309.9° E.L. The drift of Intelsat 902 is expected to begin November 15, 2019⁴ and will take approximately five months.

During the drift of Intelsat 902, 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: 6173.7 MHz and 6176.3 MHz in the uplink; and 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz in the downlink. Additionally,

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 Intelsat License LLC’s Request for 30-day Grant of Special Temporary Authority to Drift Intelsat 902 to 309.9 E.L., File No. SAT-STA-20191104-00125 (filed Nov. 4, 2019).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01199, File No. SAT-MOD-20160816-00084 (Nov. 4, 2016) (Public Notice); see Letter from Cynthia J. Grady, Senior Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, File No. SAT-MOD-20160816-00084 (Oct. 23, 2019).

⁴ See *supra* n. 2

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once on-station at 309.9° E.L., the satellite will utilize the following communications frequencies: 5850-6425 MHz and 14000-14500 MHz in the uplink; and 3625-4200 MHz, 10950-11200 MHz, and 11450-11700 MHz in the downlink

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. Intelsat will operate Intelsat 902's communications payload and TT&C frequencies at 309.9° E.L. in conformance with existing coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations. Should any interference occur during the drift or on-station, 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 902 at 309.9° E.L.⁵ Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 902 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 add capacity at the nominal 310° E.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
Jennifer Balatan

⁵ Intelsat 902 will be nominally collocated with Intelsat 9, which will operate at 310.0° E.L. See Intelsat License LLC's Request for Extension of Special Temporary Authority to Drift Intelsat 9 to 50.0 W.L., File No. SAT-STA-20191025-00120 (granted Nov. 14, 2019).