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December 10, 2019

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

Re: Request for Extension of Special Temporary Authority to Drift Intelsat 902 to 309.9° E.L.; Call Sign: S2406

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")[1] previously granted to Intelsat[2] to drift Intelsat 902 (Call Sign S2406) from 62.0° E.L. to 309.9° E.L. (50.1° W.L). Intelsat has filed an identical 180-day request for STA[3] and intends to file an application to modify the Intelsat 902 satellite license in support of this redeployment.

Recently, Intelsat 39 (Call Sign S3023) replaced Intelsat 902 at the nominal 62.0° E.L. orbital location and began providing service.[4] Intelsat 902 is being relocated to 309.9° E.L. to add capacity at the nominal 310° E.L. orbital location after the loss of Intelsat 29e. The drift of Intelsat 902 began on November 15, 2019 and is expected to take approximately five months.

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[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 Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01427, File No. SAT-STA-20191104-00125 (Nov. 15, 2019) (Public Notice).

[3] *See Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01428, File No. SAT-STA-20191114-00132 (Nov. 22, 2019) (Public Notice).

[4] *See* Application of Intelsat License LLC to Modify Authorization for Intelsat 39, File No. SAT-MOD-20191024-00119 at 2 (filed Oct. 24, 2019).

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During the drift of Intelsat 902, Intelsat will continue to 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.

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat is operating only the above-listed TT&C frequencies during the drift and will continue to 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 Federal Communications Commission ("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 extension 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 FCC grant this STA extension 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. (50.0° W.L.). *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01426, File No. SAT-STA-20190925-00100 (Nov. 8, 2019) (Public Notice).