



*with conditions

File # SAT-STA-20191212-00146

Call Sign S3023 Grant Date 12/19/19

(or other identifier)

From 12/20/19 Term Dates period of 60 days
To: 60 days

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Dec 12 2019 4:47:50:523PM
File Number: SAT-STA-20191212-00146
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 Further Extension of Special Temporary Authority to Operate Intelsat 39 at 61.95 E.L.

1. Applicant

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

ATTACHMENT TO GRANT
 Intelsat License LLC
 IBFS File No. SAT-STA-20191212-00146

IBFS File No(s):	SAT-STA-20191212-00146	<p>GRANTED- With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S3023	
Satellite Name:	Intelsat 39	
Orbital Location: (required station-keeping tolerance)	61.95° E.L. (+/-0.05 degrees east/west)	
Administration:	United States of America	
Nature of Service:	Fixed-Satellite Service (FSS)	
Scope of Grant:	Special temporary authority for a period of 60 days ¹ to operate Intelsat 39 at the 61.95° E.L. orbital location. ²	
Service Area(s):	Not Applicable	
Frequencies:	On station 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) Telemetry, Tracking and Control 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>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:</p> <ol style="list-style-type: none"> 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. 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 61.95° E.L. orbital location. 4. 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 61.95° E.L. orbital location. 		

¹ Intelsat requests a grant of 60-days special temporary authority, which is permissible without public notice pursuant to section 25.120(b)(3) of the Commission's rules. Under this rule, the Commission "may" grant a temporary authorization for a period not to exceed 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. In this instance, we grant the STA for 60 days instead of a shorter duration because Intelsat also has filed a license modification for the service requested. *See* IBFS File No. SAT-MOD-20191024-00119.

² Intelsat previously received special temporary authority to perform IOT and operate Intelsat 39 at the 61.95° E.L. *See* IBFS File No. SAT-STA-20190820-00078.

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5. FSS operations of Intelsat 39 at the new 61.95° E.L. orbital location must comply with the conditions imposed in IBFS File No. SAT-LOA-20171205-00164 for operations of Intelsat 39 at the previously-approved 62.0° E.L. orbital location.³

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).

Action Date:	December 19, 2019
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Term Dates	From: December 20, 2019	To: period of 60 days
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Approved:



Stephen J. Duall
Chief, Satellite Policy Branch

³ Any conditions in IBFS File No. SAT-LOA-20171205-00164 that applied to the 62.0° E.L. orbital location will now apply to the 61.95° E.L. orbital location.

2. Contact

Name:	Cynthia J. Grady	Phone Number:	703-559-6949
Company:	Intelsat US LLC	Fax Number:	703-559-8539
Street:	7900 Tysons One Place	E-Mail:	cynthia.grady@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:		Relationship:	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 SATMOD2019102400119 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
61.95 E.L.

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 60 days of Special Temporary Authority previously granted to Intelsat to operate Intelsat 39 at 61.95 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. 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.

December 12, 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 in-orbit testing (“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 *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01428, File No. SAT-MOD-20191024-00119 (Nov. 22, 2019).

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. Intelsat 39 is not 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 continue to utilize this tunable range on-station at 61.95° E.L.