



INTELSAT.

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December 17, 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 Extend the Intelsat 805 License Term;
Call Sign: S2404

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing January 1, 2020, to extend the Intelsat 805 (Call Sign S2404) license term to allow temporary continued operations at 169.1° E.L. under the terms of the Intelsat 805 permanent license.² The current license term for Intelsat 805 expires on December 31, 2019.

Intelsat seeks this temporary extension in order to de-orbit the satellite. Intelsat plans to begin de-orbit maneuvers in early January and to complete the de-orbit by January 30, 2020. The de-orbit schedule is based on current manpower/schedule constraints.

Temporarily extending the license term of the Intelsat 805 satellite will not affect the satellite’s post-mission disposal plan. As approved in the most recent Intelsat 805 license modification, Intelsat intends to dispose of the Intelsat 805 satellite by moving it to a minimum altitude of 150 kilometers above the geostationary arc and has reserved 15.97 kilograms of fuel for this purpose.³ The satellite’s subsystems and solar panels are functioning normally, and there are no single points of failure on Intelsat 805 that would result in an inability to de-orbit the satellite.

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-01361, File No. SAT-MOD-20180807-00059 (Nov. 30, 2018) (Public Notice). To the extent necessary, Intelsat requests that all waivers granted in the Intelsat 805 permanent license be extended to this requested STA.

³ See Intelsat License LLC Application to Modify Authorization for Intelsat 805, File No. SAT-MOD-20180807-00059, Engineering Statement at 7 (corrected stamp grant Feb. 8, 2019). Due to the design of Intelsat 805, Intelsat will not be able to vent all pressurized systems and has previously obtained waivers of 47 C.F.R. §§ 25.114(d)(14)(ii) and 25.283(c). See *id.* at 6; see *supra* n. 2, Grant Condition 17 (extending prior granted waivers of 47 C.F.R. §§ 25.114(d)(14)(ii), 25.283(c)).

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Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 805 in conformance with all relevant coordination agreements for the nominal 169° E.L. orbital location.

Grant of this STA request to extend the license will serve the public interest by allowing the continuation of operations of Intelsat 805 until the satellite's scheduled de-orbit is complete.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications 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