



INTELSAT.

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January 9, 2020

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 Horizons 2 to 73.8° W.L.
Call Sign: S2423

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 60 days, commencing January 24, 2020, to drift Horizons 2 (Call Sign S2423) from 84.85° E.L. to 73.8° W.L. (286.2° E.L.). Intelsat will also be filing a 180-day request for STA and an application to modify the Horizons 2 satellite license in support of this redeployment.

The Horizons 2 satellite is currently operating at 84.85° E.L.² Subject to receipt of Federal Communications Commission (“FCC” or “Commission”) approval, Horizons 2 will be relocated to 73.8° W.L. The drift of Horizons 2 is expected to begin on January 24, 2020, and will take approximately three months.

During the drift of Horizons 2, Intelsat will only utilize the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The TT&C frequencies are as follows: 12196.0 MHz and 12198.625 MHz (space-to-Earth); and 14000.5 MHz and 14499.5 MHz (Earth-to-space).

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. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-MOD-20110928-00190 (Feb. 3, 2012) (Public Notice).

Ms. Marlene H. Dortch

January 9, 2020

Page 2

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 Horizons 2 at 73.8° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Horizons 2 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 provide new customer services at the nominal 74° W.L. orbital location.

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: Steven Duall
Jay Whaley
Jennifer Balatan