

March 10, 2020

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

Re: **Request for Special Temporary Authority** Intelsat 901; Call Sign S2405

Dear Ms. Dortch:

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Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 60 days, commencing March 27, 2020, to operate Intelsat 901 (Call Sign S2405) with a new platform bias, 0.60°W, 0.15°N, in order to change the satellite's coverage area. Intelsat will be seeking a permanent modification to support this platform bias.

Intelsat 901 is permanently licensed to operate at 27.5° W.L., with a different platform bias than the beam coverage proposed herein, as part of a combined vehicle stack ("CVS") with MEV-1 (Call Sign S2990).² The CVS is currently being reinserted into geostationary orbit at 27.5° W.L. to replace Intelsat 907 (Call Sign S2411).³ The requested platform bias will provide better coverage for the customers currently on Intelsat 907 when they are transitioned to Intelsat 901.

Pursuant to a grant of authority from the Federal Communications Commission ("FCC"), the satellite will be biased to 0.60°W, 0.15°N in order to achieve the new coverage. Intelsat 901 will operate in the following:

telemetry, tracking, and control ("TT&C") frequencies: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz (space-to-Earth); and 6173.7 MHz and 6176.3 MHz (Earth-to-space);⁴ and

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-01397, File No. SAT-MOD-20190207-00009 (Jun. 21, 2019) (Public Notice).

³ Intelsat plans to deorbit Intelsat 907 after transferring its traffic to Intelsat 901.

⁴ While part of the CVS, Intelsat 901 will not engage in any station-keeping or attitude control maneuvers. Space Logistics LLC, under the direction of Intelsat, will use the following TT&C frequencies for CVS station-keeping and attitude control maneuvers: 3944.5 MHz and 3955.5 MHz (space-to-Earth); 6170.0 MHz and 6180.0 MHz. See n. 2.

Intelsat US LLC 7900 Tysons One Place, McLean, VA 22102-5972 USA | T +1 703-559-6800 | www.intelsat.com Ms. Marlene Dortch March 10, 2020 Page 2

> communications frequencies: 3625-4200 MHz, 10950-11200 MHz, and 11450-11700 MHz (space-to-Earth); and 5850-6425 MHz and 14000-14500 MHz (Earth-tospace).

The proposed operations over the new coverage area will conform to existing coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

The proposed platform bias of Intelsat 901 will allow Intelsat to replace Intelsat 907, which currently operates at 27.5° W.L. with similar coverage areas as requested herein. The replacement of Intelsat 907 ensures customer service continuity at 27.5° W.L. and, accordingly, is in the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Sincerely,

<u>/s/ Cynthia J. Grady</u> Cynthia J. Grady Senior Counsel Intelsat US LLC

cc: Jay Whaley Jennifer Balatan