



April 21, 2020

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

**Re: Request for Special Temporary Authority
Intelsat 907; Call Sign S2411**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of 30 days of Special Temporary Authority (“STA”),¹ commencing April 27, 2020, to drift Intelsat 907 from 27.5° W.L. to, and operate the satellite at, 27.6° W.L. Specifically, Intelsat seeks STA to operate the telemetry, tracking, and command (“TT&C”) and Ku-band communications frequencies on the Intelsat 907 during the drift from 27.5° W.L. to 27.6° W.L. and on-station at 27.6° W.L. The drift is expected to take approximately one week. Intelsat is seeking 30 days of STA to operate Intelsat 907 at 27.6° W.L. until the satellite’s deorbit, which is planned for next month—May 2020.

Intelsat 907’s TT&C frequencies are: 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz in the uplink; and 6173.7 MHz and 6176.3 MHz in the downlink. Intelsat 907’s Ku-band communications frequencies are: 14.0-14.5 GHz in the uplink; and 10.95-11.2 GHz and 11.45-11.7 GHz in the downlink.

The Intelsat 907 and Intelsat 901 (Call Sign S2405)² satellites currently operate in the same station-keeping box at the 27.5° W.L. orbital location.³ Intelsat is seeking this small fleet management move, .1° west, to allow Intelsat to operate Intelsat 907 and Intelsat 901 (as a CVS)

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$945.00 filing fee electronically via the International Bureau’s Filing System.

² In February 2020, Intelsat 901 and MEV-1 (Call Sign 2990) successfully docked above the geostationary orbit and the two spacecraft then redeployed to 27.5° W.L. and began operating as a combined vehicle stack (“CVS”). See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (June 21, 2019) (“Intelsat 901 Authorization at 27.5° W.L.”); *Policy Branch Information; Actions Taken*, Report No. SAT-01397, File Nos. SAT-LOA-20170224-00021 and SAT-AMD-20190207-00008 (Dec. 8, 2017) (Public Notice).

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01299, File No. SAT-MOD-20171023-00142 (Jan. 26, 2018); Intelsat 901 Authorization at 27.5° W.L. See also Application to Modify Authorization for Intelsat 901, File No. SAT-MOD-20200402-00030 (filed Apr. 2, 2020) (seeking to modify the satellite’s beam coverage and extend the satellite’s license term).

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in separate station-keeping boxes. Intelsat is seeking STA to better ensure safe station-keeping of Intelsat 901 and Intelsat 907 until the latter's deorbit in a few weeks.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 907 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 907 at 27.6° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 907 at 27.6° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat's proposed operations of Intelsat 907 will conform to existing coordination agreements and the Federal Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations.

Grant of this STA request is in the public interest because it will allow Intelsat to better ensure the safe station-keeping of Intelsat 901 and Intelsat 907. 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: Jay Whaley
Jennifer Balatan