



April 22, 2020

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

Re: Request for extension of Special Temporary Authority to drift Intelsat 9 to 50.0° W.L.; Call Sign: S2380

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to drift Intelsat 9 (Call Sign S2380) from 66.15° E.L. to 50.0° W.L.³ Intelsat has filed a permanent application to modify the Intelsat 9 satellite license for this redeployment.⁴

Intelsat will continue to be utilizing the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will continue to follow industry practices for coordinating TT&C transmissions. The TT&C frequencies are as follows: 14.0005 GHz and 14.4945 GHz in the uplink, and 11.7005 GHz and 11.7020 GHz in the downlink.

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies, will coordinate its TT&C transmissions with operators of other satellites, and will operate in accordance with all applicable coordination agreements at 50.0° W.L. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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 Intelsat 9 at 50.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 9 that

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-01426, Report No. SAT-STA-20190925-00100 (Nov. 8, 2019) (Public Notice).

³ Intelsat 9 recently arrived on-station at 50.0° W.L., and Intelsat is seeking extension of STA to continue providing TT&C at 50.0° W.L. while Intelsat’s permanent modification application is pending.

⁴ See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01449, File No. SAT-MOD-20200226-00019 (Mar. 6, 2020) (Public Notice).

Intelsat US LLC

7900 Tysons One Place, McLean, VA 22102-5972 USA | T +1 703-559-6800 | www.intelsat.com

Ms. Marlene H. Dortch
April 22, 2020
Page 2

is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

Grant of this STA extension request is in the public interest because it will allow Intelsat to provide service at the 50.0° W.L. orbital location after the loss of Intelsat 29e and ensure safe station-keeping at 50.0° W.L.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA extension 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