



May 20, 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**
Intelsat 901; Call Sign S2405

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² 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 has filed a modification application to support this platform bias.³

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).⁴ The CVS is currently at 27.5° W.L. to replace Intelsat 907 (Call Sign S2411), which began deorbiting on May 18, 2020.⁵ The requested platform bias will provide better coverage for the customers formerly on Intelsat 907 after their transition to Intelsat 901.

The satellite is operating on a bias of 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);⁶ 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 *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01457, File No. SAT-STA-20200310-00025 (Apr. 3, 2020) (Public Notice).

³ See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01465, File No. SAT-MOD-20200402-00030 (May 15, 2020) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (Jun. 21, 2019) (Public Notice).

⁵ Intelsat is deorbiting Intelsat 907 after transferring its traffic to Intelsat 901.

⁶ 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

Intelsat US LLC

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

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

The platform bias of Intelsat 901 will allow Intelsat to replace Intelsat 907, which is authorized to operate 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 extension 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

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. 4.