

July 8, 2020

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

**Re: Request for Further Extension of Special Temporary Authority to Operate
Intelsat 902 at 309.9° E.L.; Call Sign: S2406**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests an additional 60 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to operate Intelsat 902 (Call Sign S2406) at 309.9° E.L. (50.1° W.L.). Intelsat has a pending an application to modify the Intelsat 902 satellite license in support of this redeployment.³

Intelsat 902 arrived at 309.9° E.L. on or about April 30, 2020. On-station at 309.9° E.L., the satellite will continue to utilize the following :

- communications frequencies 5850-6425 MHz and 14000-14500 MHz in the uplink; and 3625-4200 MHz, 10950-11200 MHz, and 11450-11700 MHz in the downlink; and
- telemetry, tracking, and control (“TT&C”) frequencies 6173.7 MHz and 6176.3 MHz in the uplink; and 3947.5 MHz, 3948.0 MHz, 3952.0 MHz, and 3952.5 MHz in the downlink.

Grant of this further STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 902’s communications payload and TT&C frequencies at 309.9° E.L. in conformance with existing coordination agreements and the Federal Communications Commission’s (“FCC” or “Commission”) rules governing operations vis-à-vis adjacent locations. Should any interference occur during the drift or on-station, 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, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01440, File No. SAT-STA-20191114-00132 (Jan. 17, 2020) (Public Notice). Prior grants included authority to drift to 309.9° E.L.

³ See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01465, File No. SAT-MOD-20200326-00028 (May 15, 2020) (Public Notice).

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Further, in support of this request Intelsat incorporates the technical information provided in its pending modification application.⁴

Grant of this further STA extension request is in the public interest because it will allow Intelsat to add capacity at the nominal 310° E.L. orbital location after the loss of Intelsat 29e.

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

⁴ *Id.*