

July 15, 2020

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

Re: Request for 180 days of Special Temporary Authority to Conduct In-Orbit Testing of Galaxy 30 and Drift the Satellite to 125.0° W.L.; Call Sign S3016

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests a grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to conduct in-orbit testing (“IOT”) of the Galaxy 30 satellite (Call Sign S3016) at 84.55° E.L. and to drift the satellite to its permanent location of 125.0° W.L.² Galaxy 30 is scheduled to be launched July 28, 2020. The IOT and drift are expected to last approximately 172 days.³

Galaxy 30’s payload testing will be performed in the following frequency bands:

- 3700-4200 MHz, 10700-11700 MHz, 17800-18800 MHz, 19200-20200 MHz (space-to-Earth); and
- 5925-6425 MHz, 12750-13250 MHz, 13750-14500 MHz, 27600-28600 MHz, 29000-30000 MHz (Earth-to-space).

Telemetry, Tracking, and Command (“TT&C”) services for Galaxy 30 will be performed at the following center frequencies and in the following frequency bands:

- 6421.75 MHz and 6424.25 MHz (space-to-Earth); and
- 4197.5 MHz and 4198.5 MHz (Earth-to-space).

In support of its request, Intelsat submits the following information.

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-01359, SAT-AMD-20180410-00026 (Nov. 16, 2018) (Public Notice) (granted in part, denied in part). During the drift from 84.55° E.L. to 125.0° W.L. only the satellite’s TT&C frequencies will be utilized.

³ Intelsat is also seeking 30 days of STA to accommodate the requested operations herein. See Intelsat License LLC’s, as debtor in possession, Request for Special Temporary Authority to Conduct In-Orbit Testing of Galaxy 30 and Drift the Satellite to 125.0° W.L., File No. SAT-STA-20200702-00084 (filed July 2, 2020).

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During Galaxy 30's IOT at 84.55° E.L., Intelsat will operate in the above referenced C-, Ku-, and Ka-bands. Intelsat has completed coordination with the operational satellites within +/-6 degrees of the IOT location. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 during IOT at 84.55° E.L. Galaxy 30 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 Federal Communications Commission ("FCC" or "Commission") licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 30 at 84.55° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 30 at 84.55° E.L. that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

The IOT of the Galaxy 30 satellite's C-, Ku-, and Ka-band payloads at 84.55° E.L. is a critical step in ensuring that the satellite will be fully operational at 125.0° W.L. This, in turn, will provide additional capacity to customers at the 125.0° W.L. location, and thereby promotes the public interest.

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

Sincerely,

/s/ Cynthia J. Grady
Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Jay Whaley
Jennifer Balatan