



January 25, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Special Temporary Authority to Drift Intelsat 10 to, and Operate at, 177.8° E.L.; Call Sign: S2382

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests a grant of Special Temporary Authority ("STA")¹ for 60 days, commencing March 1, 2021, to drift Intelsat 10 (S2382) to, and operate at, 177.8° E.L. The drift to 177.8° E.L. is expected to take approximately 12 weeks. Intelsat intends to file a modification application to support this redeployment.²

Intelsat 10 is currently licensed to operate at 47.5° E.L.³ During the drift of the Intelsat 10 satellite, Intelsat will utilize only the satellite's telemetry, tracking, and control ("TT&C") frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process.

Intelsat 10's TT&C frequencies are as follows: 14000.5 MHz and 14499.5 MHz in the uplink; and 11699.0 MHz, 12747.5 MHz, 12748.5 MHz, and 12749.5 MHz in the downlink. Additionally, once on-station at 177.8° E.L., the satellite will utilize the following communications frequencies: 5925-6425 MHz and 14000-14500 MHz in the uplink; and 3700-4200 MHz, 11450-11700 MHz, and 12250-12750 MHz in the downlink.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. Intelsat will operate Intelsat 10's communications payload and TT&C frequencies at 177.8° E.L. in conformance with existing coordination agreements and the Federal Communications Commission's ("FCC") 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 Intelsat is also seeking 180 days of STA.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01454, File No. SAT-MOD-20191008-00109 (Mar. 20, 2020) (Public Notice).

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 10 at 177.8° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 10 that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

Grant of this STA request is in the public interest because it will allow Intelsat to provide new capacity from the 177.8° E.L. orbital location.

For the reasons set forth herein, Intelsat respectfully requests that the FCC 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
Assistant General Counsel
Intelsat US LLC

cc: Merissa Velez
Jay Whaley
Jennifer Balatan