

January 27, 2021

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

Re: Request for Special Temporary Authority to Drift Galaxy 14 to, and Operate at, 32.9° E.L.; Call Sign: S2385

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 February 16, 2021, to drift Galaxy 14 (S2385) to, and operate at, 32.9° E.L.² The drift to 32.9° E.L. is expected to take approximately 18 weeks. Intelsat intends to file an amendment application to support this redeployment.³

Galaxy 14 is currently licensed to operate at 125.0° W.L.⁴ The Galaxy 30 (S3016) satellite,⁵ which will replace Galaxy 14, was launched on August 15, 2020 and is currently drifting to 125.0° W.L. After the successful arrival of, and traffic transfer to, Galaxy 30, Intelsat intends to redeploy Galaxy 14 to the 32.9° E.L. orbital location. During the drift of the Galaxy 14 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.

Galaxy 14’s TT&C frequencies are as follows: 6420.5 MHz in the uplink; and 4198.0 MHz and 4199.875 MHz in the downlink. Additionally, once on-station at 32.9° E.L., the satellite will utilize the following communications frequencies: 5925-6425 MHz in the uplink; and 3700-4200 MHz in the downlink.

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. See Request of Intelsat License LLC for 180-day grant of Special Temporary Authority to drift Galaxy 14 (S2385) to, and operate at, 32.9 E.L. File No. SAT-STA-20210106-00003 (filed Jan. 6, 2021).

³ Intelsat recently filed a modification application to extend the license term of Galaxy 14. See Application of Intelsat License LLC, as debtor in possession, to Modify Authorization for Galaxy 14, File No. SAT-MOD-20201229-00152 (filed Dec. 29, 2020).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT- 00340, File No. SAT-MOD-20051206-00261 (Jan. 27, 2006) (Public Notice).

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01359, File No. SAT-AMD-20180410-00026 (Nov. 16, 2018) (Public Notice).

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 Galaxy 14's communications payload and TT&C frequencies at 32.9° 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.

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 Galaxy 14 at 32.9° E.L.⁶ Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 14 that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

The redeployment of Galaxy 14 after Galaxy 30 is placed into service at 125.0° W.L. will maximize the use of on-orbit resources and will allow Intelsat to provide additional capacity for customers at the nominal 33° E.L. orbital location. As such, this STA request is in the public interest.

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

⁶ At 32.9° E.L., Galaxy 14 will be nominally collocated with Intelsat 28, which is licensed to operate at 32.8° E.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-00800, File No. SAT-MOD-20101029-00228 (Aug. 12, 2011) (Public Notice).