



May 7, 2021

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

Re: Request for Special Temporary Authority to Deorbit Telkom-2
Call Sign: S2988

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, commencing May 31, 2021, to deorbit Telkom-2 from its current operational location of 157.0° E.L.² Due to current manpower/schedule constraints, Telkom-2's deorbit maneuvers are scheduled to begin June 1, 2021 and should be completed by June 30, 2021. The current license term for Telkom-2 expires on May 30, 2021.³

During deorbit, Intelsat will only utilize the satellite's telemetry, tracking, and control ("TT&C") frequencies. Telkom-2's specific TT&C frequencies are: 3701.25 MHz (space-to-Earth), 4199.61 MHz (space-to-Earth), 5926.5 MHz (Earth-to-space), and 6423.5 MHz (Earth-to-space).

Grant of this STA request will not affect the satellite's previously approved post-mission disposal plan. As approved in the Telkom-2 license application,⁴ Intelsat intends to dispose of the Telkom-2 satellite by moving it to 263.6 kilometers above the geostationary arc⁵ and has reserved 5.5 kilograms of fuel⁶ for this purpose. The satellite's subsystems and solar panels are functioning

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-01250, File No. SAT-LOA-20170124-00009 (July 7, 2017) (Public Notice).

³ See *id.* at Grant Condition 8.

⁴ See Intelsat License LLC Application for Authority to Operate Telkom-2, an In-orbit Satellite, at 157.0° E.L., File No. SAT-LOA-20170124-00009, Legal Narrative at 4-5, Engineering Statement at 5 (stamp grant Nov. 30, 2017).

⁵ In calculating the disposal orbit, Intelsat used simplifying assumptions as permitted under the Federal Communications Commission's ("Commission") Orbital Debris Report and Order. See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004). The effective area to mass ratio (Cr*A/M) of the satellite is 0.026 m²/kg, resulting in a minimum perigee disposal altitude under the Inter-Agency Space Debris Coordination Committee formula of 263.6 kilometers above the geostationary arc.

⁶ The reserved propellant figure is an estimate. See *supra* n. 4, Engineering Statement at 5.

Ms. Marlene H. Dortch
May 7, 2021
Page 2

normally, and there are no single points of failure on Telkom-2 that would result in an inability to de-orbit the satellite.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate the satellite's TT&C functions in conformance with all relevant coordination agreements. Further, grant of this STA request will serve the public interest by allowing the continuation of Telkom-2's TT&C operations until its scheduled deorbit is completed.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Karl Kensinger
Merissa Velez
Jay Whaley
Jennifer Balatan