



July 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 25 to 66.13° E.L.;  
Call Sign: S2154**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests 30 days of Special Temporary Authority (“STA”),<sup>1</sup> commencing August 23, 2021, to drift Galaxy 25 (Call Sign S2154)<sup>2</sup> from 32.9° E.L. to 66.13° E.L. and to operate at 66.13° E.L. upon arrival. The drift to 66.13° E.L. is expected to take approximately 12 weeks.<sup>3</sup>

The Galaxy 25 satellite is currently operating at 32.9° E.L.<sup>4</sup> During the drift of the Galaxy 25 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 25’s TT&C frequencies are as follows: 4195.5 MHz, 4199.5 MHz, 11702 MHz and 12198 MHz (downlink); and 5926.5 MHz and 6423.5 MHz (uplink).<sup>5</sup>

---

<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> Galaxy 25 is licensed to operate at 93.1° W.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01203, File No. SAT-MOD-20161004-00097 (Dec. 9, 2016) (Public Notice).

<sup>3</sup> Intelsat intends to file a request for additional STA as needed to complete drift and subsequently operate the satellite at 66.13° E.L.

<sup>4</sup> Galaxy 25 is currently operating at 32.9° E.L. pursuant to STA and has filed a related modification application for continued operations at 32.9° E.L., which remains pending before the Commission. See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01562, File No. SAT-STA-20210408-00047 (June 25, 2021) (Public Notice), see also *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01532, File No. SAT-MOD-20201215-00144 (Feb. 26, 2021) (Public Notice). Intelsat will amend its pending modification application to request license to operate at the 66.13° E.L. location.

<sup>5</sup> The FCC has previously granted Intelsat authorization to use the 11702 MHz and 12198 MHz center frequencies for Galaxy 25 TT&C operations, in addition to its licensed TT&C C-band frequencies. See e.g., *Policy Branch Information; Actions Taken*, Report No. SAT-01394, File No. SAT-STA-20190502-00034 (May 31, 2019) (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. Should any interference occur during the drift, 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. Galaxy 25 will be nominally co-located with Intelsat 17 (Call Sign S2814), which operates at 66.0° E.L.<sup>6</sup> Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 25 at 66.13° E.L. Finally, Intelsat is not aware of any other system with an overlapping station-keeping volume with Galaxy 25 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 additional coverage at the nominal 66° E.L. orbital location.

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

Please direct any questions regarding this request to the undersigned at (703) 559-7799.

Sincerely,

/s/ W. Ray Rutngamlug  
W. Ray Rutngamlug  
Associate General Counsel  
Intelsat US LLC

cc: Merissa Velez  
Jay Whaley  
Jennifer Balatan

---

<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00739, File No. SAT-LOA-20100726-00167 (Nov. 19, 2010) (Public Notice).