



September 16, 2021

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

**Re: Request for Extension of Special Temporary Authority to Operate Intelsat 10 at 177.8° E.L.; Call Sign: S2382**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests an additional 180 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat<sup>2</sup> to operate Intelsat 10 (S2382)<sup>3</sup> at 177.8° E.L. Intelsat 10 arrived on-station at 177.8° E.L. on June 23, 2021. Intelsat intends to file a modification application to support this redeployment.

On-station at 177.8° E.L., Intelsat 10 will continue to use 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, and the following telemetry, tracking, and control (“TT&C”) frequencies: 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. Intelsat 10’s coverage areas are:

- C-band beam: western United States, Pacific Ocean Region, eastern Asia, northern Asia, and Oceania
- Ku-band beams: western United States, Pacific Ocean Region, eastern Asia, northern Asia, and Oceania

Grant of this STA extension request will not result in increased risk of harmful interference. 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

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<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> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01540, File No. SAT-STA-20210125-00014 (Mar. 26, 2021) (Public Notice) (granting authority to drift to and operate at 177.8° E.L.). Because the satellite is now on-station, Intelsat is not seeking to extend the drift authority previously granted.

<sup>3</sup> Intelsat 10 is currently licensed to operate at 47.5° E.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01454, File No. SAT-MOD-20191008-00109 (Mar. 20, 2020) (Public Notice).

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Commission's ("FCC") rules governing operations vis-à-vis adjacent locations. Should any interference occur, 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 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 extension 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 extension 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