

October 18, 2021

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

Re: Request for Further Extension of 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 an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to drift Galaxy 25 (Call Sign S2154)³ to 66.13° E.L. and to operate at 66.13° E.L. upon arrival. Galaxy 25 began its drift to 66.13° E.L. on August 23, 2021, and is expected to arrive on-station in approximately 5 weeks.⁴

During the drift of the Galaxy 25 satellite,⁵ Intelsat will continue to use only the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will continue to 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).⁶

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, e.g., *Policy Branch Information; Actions Taken*, Report No. SAT-01583, File No. SAT-STA-20210917-00124 (Oct. 1, 2021) (Public Notice). Intelsat’s previous requests for authority to operate at 66.13° E.L. were dismissed because Galaxy 25 will not occupy that location within the STA’s time frame.

³ 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).

⁴ Intelsat intends to file a request for additional STA as needed to complete the drift and subsequently operate the satellite at 66.13° E.L.

⁵ Galaxy 25 has a pending modification application for operations at 32.9° E.L., where it was located prior to its drift. See *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 authority to operate at the 66.13° E.L. location.

⁶ 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

Grant of this further STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat is operating only the above listed TT&C frequencies during the drift and is coordinating 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.⁷ 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 further STA extension 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 further STA extension 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

frequencies. See e.g., *Policy Branch Information; Actions Taken*, Report No. SAT-01394, File No. SAT-STA-20190502-00034 (May 31, 2019) (Public Notice).

⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00739, File No. SAT-LOA-20100726-00167 (Nov. 19, 2010) (Public Notice).