



December 14, 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 Operate
Galaxy 25 at 66.13° E.L.; Call Sign: S2154**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 60 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to operate Galaxy 25 (Call Sign S2154)³ at 66.13° E.L. Galaxy 25 arrived on-station at 66.13° E.L. on November 15, 2021. Intelsat has filed an amendment application to permanently operate at this location.⁴

On-station at 66.13° E.L., 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).⁵

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., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01594, File No. SAT-STA-20211117-00151 (Nov. 26, 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 See Intelsat License LLC, Amendment to Application to Modify Authorization for Galaxy 25, File No. SAT-AMD-20211213-00189 (filed Dec. 13, 2021). Intelsat intends to file a request for STA to provide commercial services at 66.13° E.L.

⁵ 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 further STA extension request will not result in increased risk of harmful interference. Intelsat is operating only the above listed TT&C frequencies at 66.13° 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, Intelsat will take all reasonable steps to eliminate such interference.

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 is nominally co-located with Intelsat 17 (Call Sign S2814), which operates at 66.0° E.L.⁶ 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 FCC 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
on behalf of Intelsat License LLC

cc: Merissa Velez
Jay Whaley
Jennifer Balatan

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