January 21, 2022

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

Re: Request for Special Temporary Authority to Drift Intelsat 5 to, and Operate at 166.15° E.L.; Call Sign: S2704

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests Special Temporary Authority ("STA")[1] for 180 days, commencing upon grant, to drift Intelsat 5 (S2704) to, and operate the satellite at 166.15° E.L. Intelsat intends to file an application for permanent authority to operate at this new location.

The Intelsat 5 satellite is permanently authorized to operate at 137.0° W.L.[2] and, pursuant to STA authority,[3] began drifting to 166.15° E.L. on January 20, 2022. The drift of Intelsat 5 is expected to take approximately 6.5 months. Once at 166.15° E.L., Intelsat 5 will be nominally collocated with Intelsat 19 (S2850). Intelsat 5's frequencies are as follows:

- Telemetry, tracking, and control ("TT&C"): 11.451 GHz, 11.452 GHz, and 11.454 GHz (space-to-Earth); 13.999 GHz and 14.498 GHz (Earth-to-space).
- Communications: 3700-4200 MHz, 10.70-10.95 GHz, 11.20-11.45 GHz and 11.45-11.7 GHz (space-to-Earth); 5925-6425 MHz, 12.75-13.25 GHz, and 14.0-14.25 GHz (Earth-to-space).

The approximate coverage area of Intelsat 5 at 166.15° E.L is attached as Exhibit A.

Grant of this STA request will not result in increased risk of harmful interference. During the drift of Intelsat 5, Intelsat will only utilize the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. Once on station, Intelsat will operate Intelsat 5 in conformance with relevant coordination agreements concerning the nominal 166° E.L. location. Should any interference occur during the drift or on station, Intelsat will take all reasonable steps to eliminate such interference.

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[1] Intelsat has filed this STA request, an FCC Form 159, and a $1,435.00 filing fee electronically via the International Bureau's Filing System.

[2] *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01538, File No. SAT-MOD-20201222-00150 (Mar. 19, 2021) (Public Notice).

[3] *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01604, File No. SAT-STA-20220106-00002 (Jan. 21, 2022) (Public Notice).

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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. Other than Intelsat 19, Intelsat is not aware of any Federal Communications Commission ("FCC" or "Commission") licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 5 at the nominal 166.0° E.L. location. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 that is the subject of an International Telecommunication Union ("ITU") filing and that is either in orbit or progressing towards launch.

Intelsat 5's operations in the 10.70-10.95 GHz, 11.20-11.45 GHz, 11.45-11.70 GHz, and 12.75-13.25 GHz band will rely on the ODYSSEY-FSS-166E and ODYSSEY-166E ITU filing of the Administration of the Federal Republic of Germany ("Germany"). Intelsat respectfully requests that the U.S. Administration state its non-objection to Germany's use of Intelsat 5 for purposes of bringing into use the Germany's at the 166.0° E.L. orbital location.

Grant of this STA request is in the public interest because it will allow Intelsat to provide additional capacity from the nominal 166° E.L. orbital location.

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

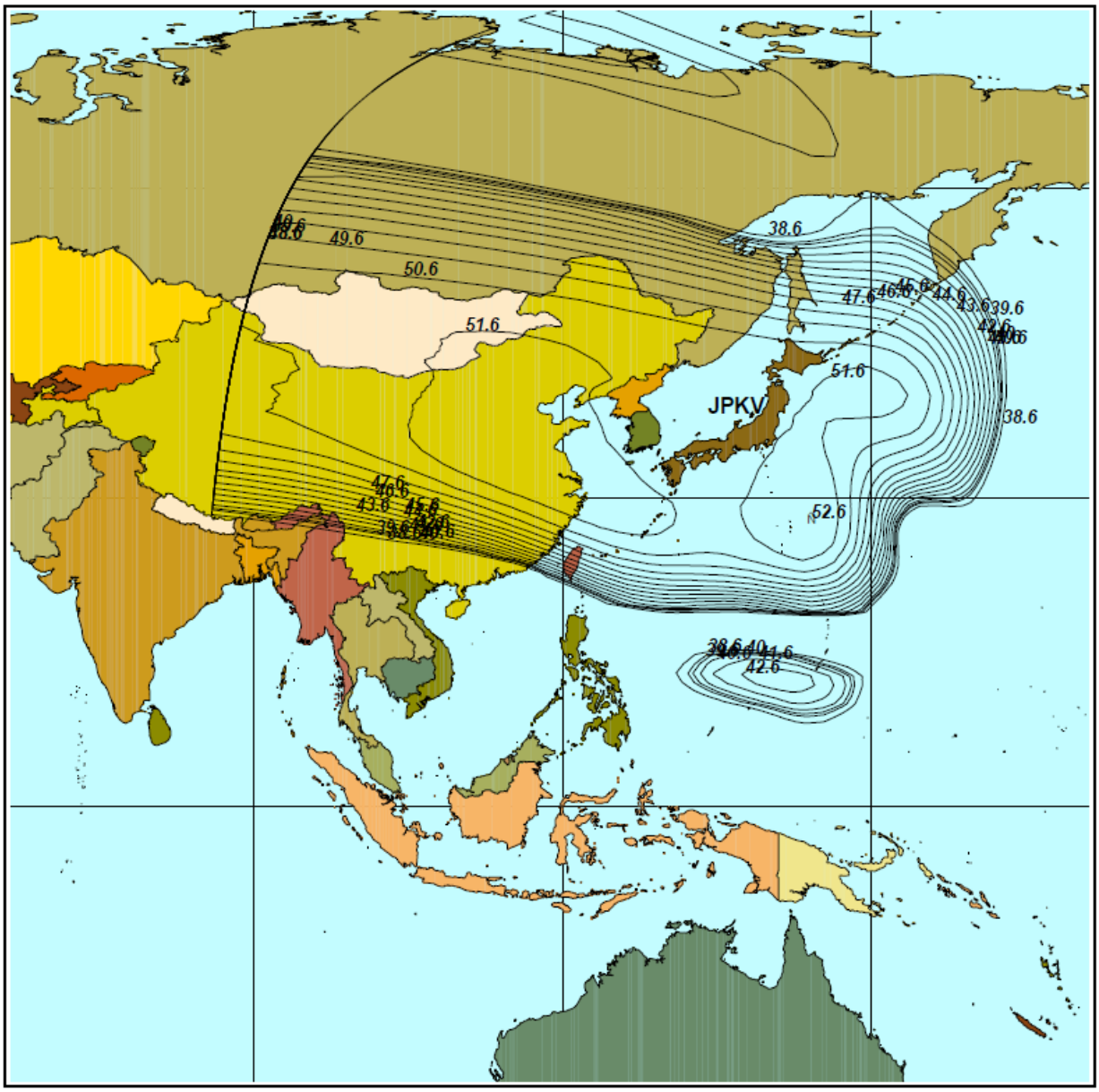
Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel, Intelsat US LLC
on behalf of Intelsat License LLC

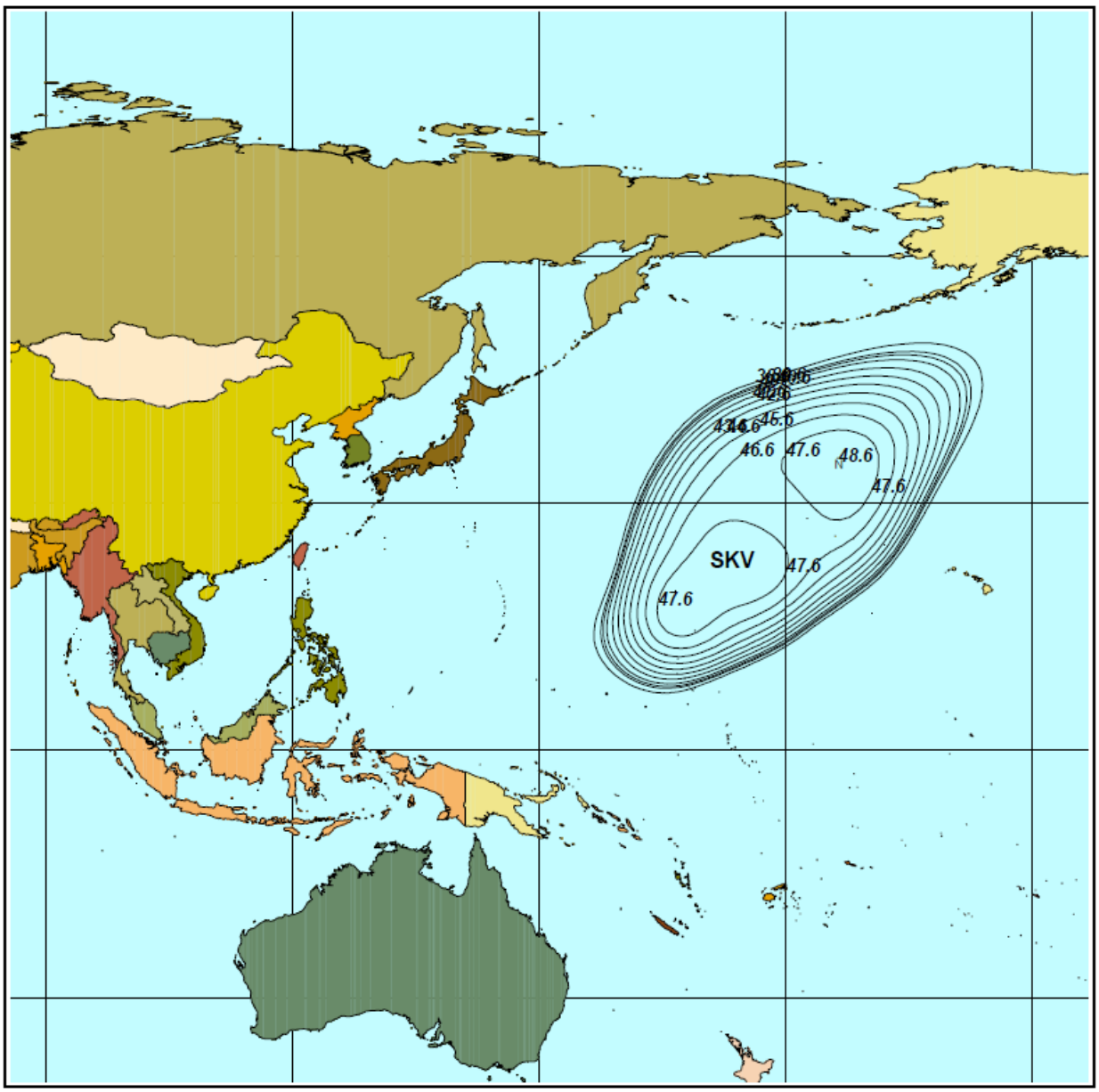
cc: Karl Kensinger
Jay Whaley
Kathyrn Medley

EXHIBIT A

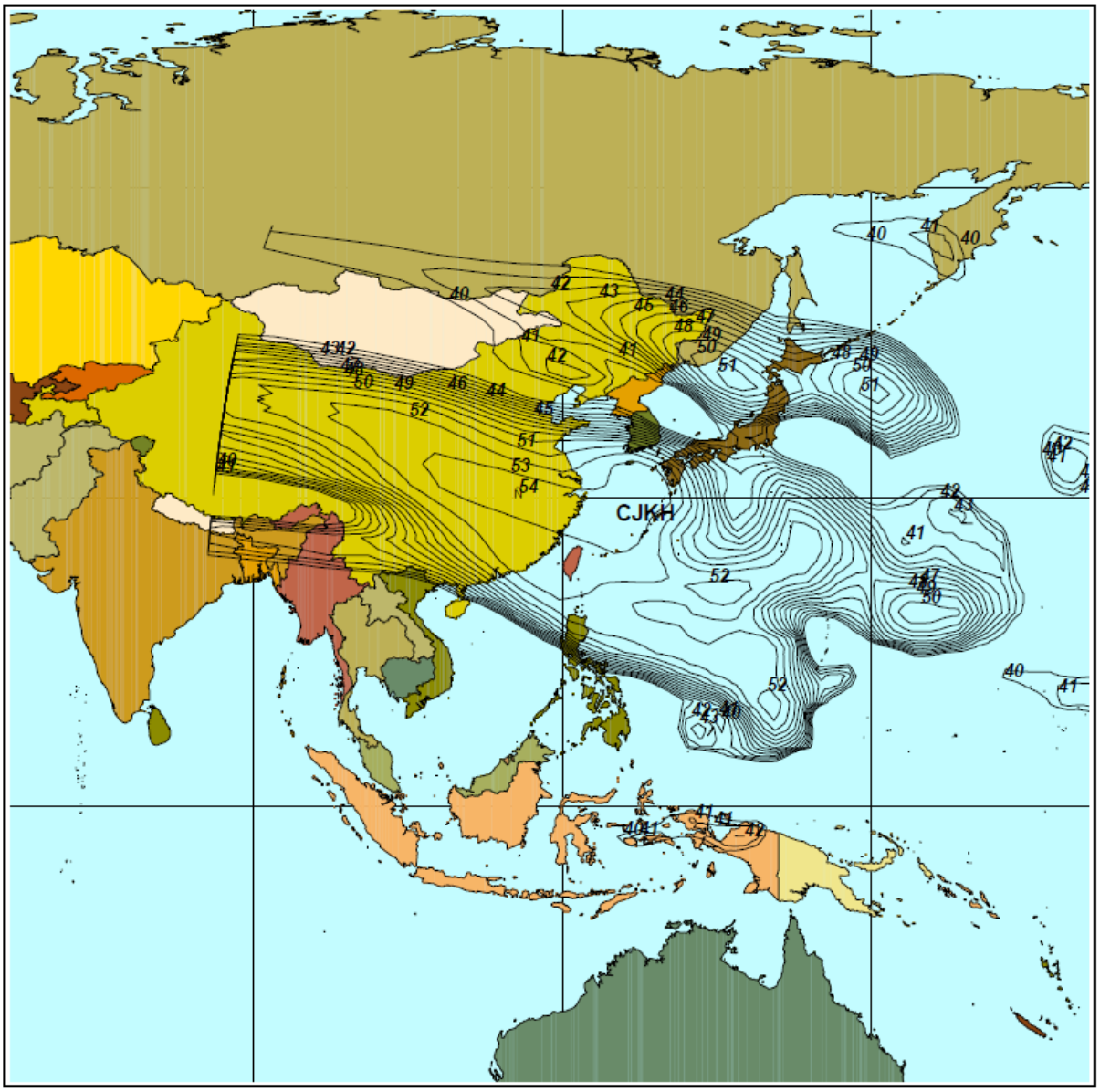
Intelsat 5@166.15°E Japan Ku-band space-to-Earth Coverage



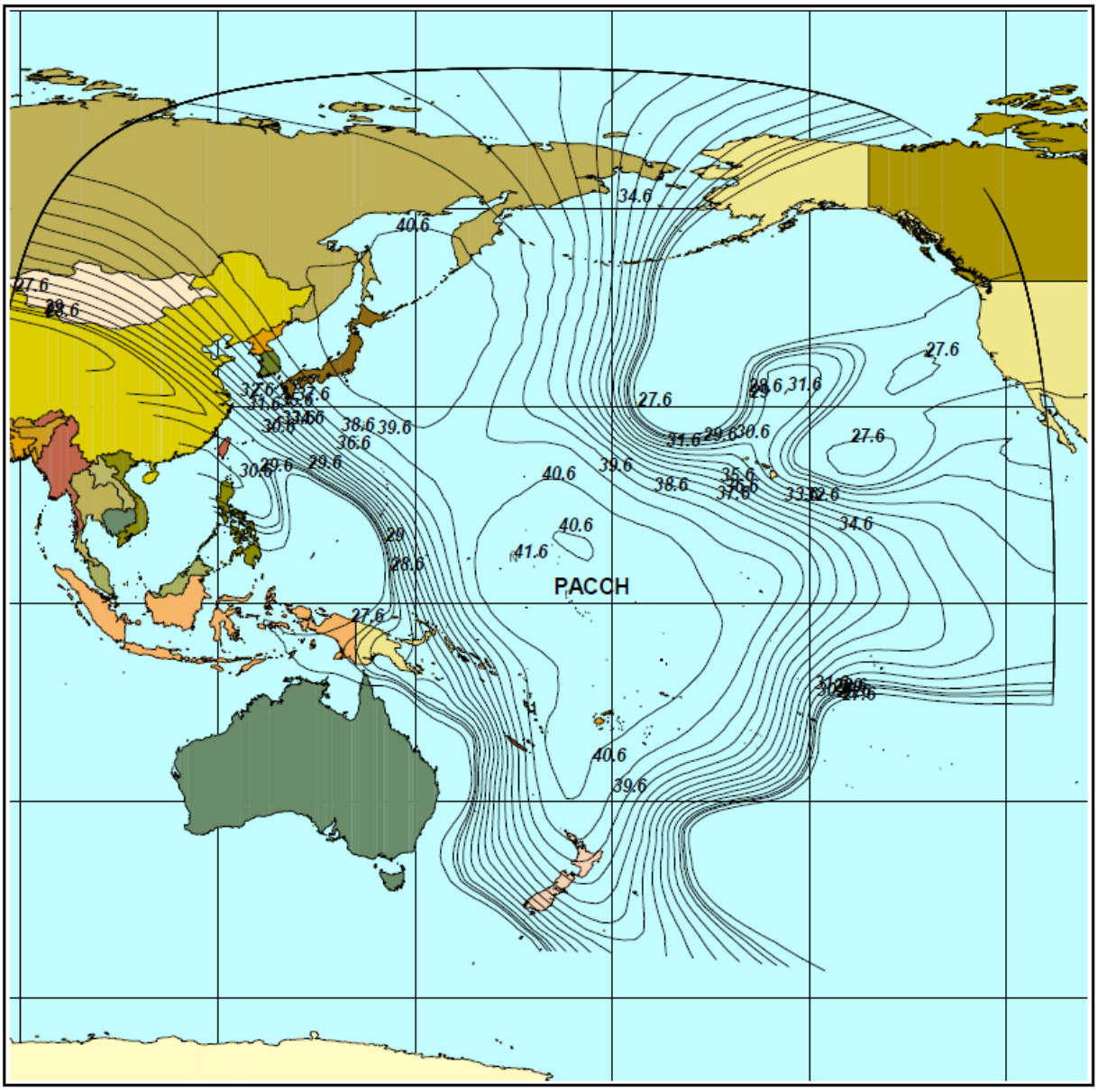
Intelsat 5@166.15°E Spot Ku-band space-to-Earth Coverage



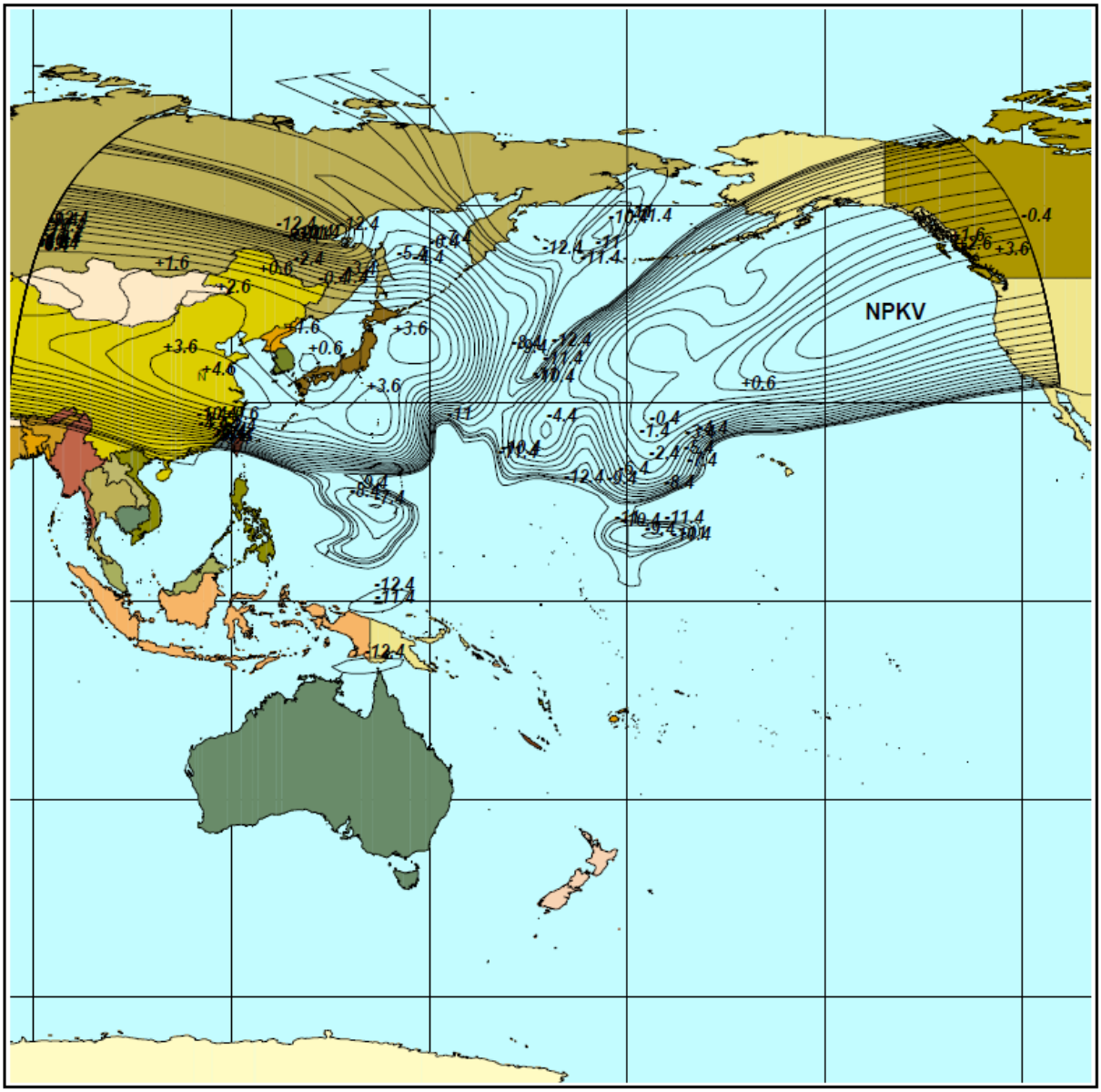
Intelsat 5@166.15°E China-Japan Ku-band space-to-Earth Coverage



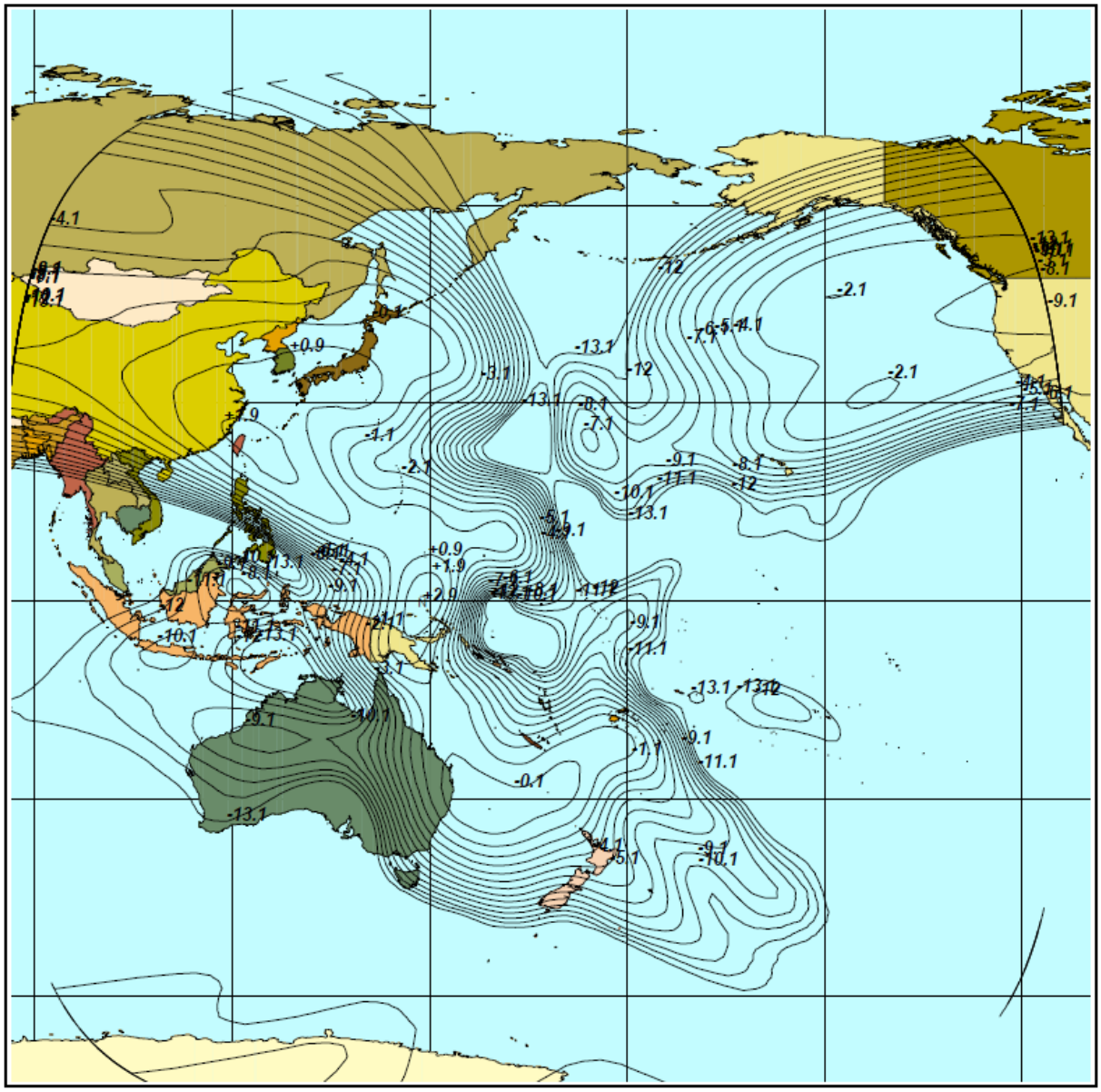
Intelsat 5@166.15°E Pacific C-band space-to-Earth Coverage



Intelsat 5@166.15°E North Pacific Ku-band Earth-to-space Coverage



Intelsat 5@166.15°E Pacific Ku-band Earth-to-space Coverage



Intelsat 5@166.15°E Pacific C-band V & H Earth-to-space Coverage