



December 13, 2022

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

Re: Request for 30-Day Special Temporary Authority Operate Galaxy 12 in
Expanded Station-Keeping Box at 129.0° W.L.; Call Sign: S2422

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing upon grant, to operate the Galaxy 12 satellite (Call Sign S2422) in an expanded +/- 0.1° East/West station-keeping box at 129.0° W.L. pursuant to waiver of Section 25.210(j) of the Federal Communications Commission's ("Commission") rules.² Intelsat is seeking authority to temporarily operate Galaxy 12 in an expanded station-keeping box to provide greater operational flexibility while Galaxy 12 is temporarily collocated with Galaxy 34 (Call Sign S3083).

Galaxy 12 is licensed to operate C-band frequencies in inclined orbit at the 129.0° W.L. orbital location.³ The C-band replacement satellite for Galaxy 12, Galaxy 34,⁴ recently completed its in-orbit testing ("IOT") at 129.0° W.L.,⁵ and arrived on station at 129.0° W.L. on December 12, 2022. Galaxy 12 and Galaxy 34 will be collocated at 129.0° W.L. through Q2 2023,⁶ when Intelsat expects to redeploy Galaxy 12.

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

² 47 C.F.R. § 25.210(j).

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01535, File No. SAT-MOD-20200909-00106 (Mar. 12, 2021) (Public Notice).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01587, File No. SAT-RPL-20210325-00039 (Oct. 22, 2022) (Public Notice).

⁵ See Letter from W. Ray Rutngamlug, Associate General Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, File No. SAT-RPL-20210325-00039 (Dec. 5, 2022) (notifying the Commission of the completion of IOT); *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01676, File No. SAT-STA-20220929-00128 (Oct. 21, 2022) (Public Notice); Application of Intelsat License LLC for Extension of Special Temporary Authority to Drift Galaxy 34 from 147.95° W.L. to 129.0° W.L., File No. SAT-STA-20221118-00164, Call Sign S3083 (filed Nov. 18, 2022).

⁶ Intelsat will internally coordinate the collocation. Additionally, the proposed operations will conform to all applicable agreements.

The Commission may grant a waiver for good cause shown.⁷ Waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.⁸ The Commission, in making this determination, may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁹ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.¹⁰

Grant of this STA request is in the public interest and there is good cause to waive Section 25.210(j). Grant of this request will provide Intelsat with additional operational flexibility to best ensure space safety while Galaxy 12 temporarily operates alongside Galaxy 34 at 129.0° W.L. In the instant case the additional flexibility is particularly useful because one of the collocated satellites, Galaxy 12, is operating in inclined orbit while the other satellite, Galaxy 34, is station-kept. Further, grant of the requested waiver would not adversely impact other operators because the requested expanded east/west station-keeping volume is adjacent to but will not overlap that of any other satellites, and Intelsat will coordinate with those satellite operators.

Additionally, the enlarged station-keeping box will conserve fuel, thus maximizing service and the operational life of the satellite. As such, grant would be consistent with Commission precedent permitting increased station-keeping volume based on a finding that doing so would not adversely affect the operations of other spacecraft and would have benefits such as conserving fuel for future operations.¹¹

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

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Jay Whaley
Jennifer Balatan
Cole Dorsey

⁷ 47 C.F.R. § 1.3.

⁸ *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166.

¹⁰ *Northeast Cellular*, 897 F.2d at 1166.

¹¹ See, e.g., *Petition to Add HISPASAT 143W-1 to the Permitted List*, Stamp Grant, File No. SAT-PDR-20191205-00143, Condition 19 (2020) (waiving Section 25.210(j) of the Commission's rules to allow HISPASAT 143W-1 to operate with a station-keeping tolerance of $\pm 0.10^\circ$).