

April 7, 2023

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

Re: Request for Special Temporary Authority to Drift Galaxy 35 to, and Operate at, 93.1° W.L.; Call Sign S3134

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA") for 60 days, commencing May 1, 2023, to drift Galaxy 35 (S3134) to, and operate the satellite at, 93.1° W.L.¹ Intelsat intends to file an application to modify the Galaxy 35 license to operate at 93.1° W.L. on a permanent basis.

Galaxy 35 is currently licensed to operate at 95.05° W.L.² During the drift of the Galaxy 35 satellite to 93.1° W.L., Intelsat will utilize only the satellite's telemetry, tracking, and control ("TT&C") frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The drift is expected to take approximately one week. Galaxy 35's TT&C frequencies are as follows: 4196.75 MHz and 4198.25 MHz (space-to-Earth); and 6422.0 MHz and 6424.5 MHz (Earth-to-space).

On-station at 93.1° W.L., Intelsat will utilize the following communications frequencies: 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space); and the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency ranges for TT&C.³

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. Intelsat will operate Galaxy 35's communications payload and TT&C frequencies at 93.1° W.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 during the drift or on-station, Intelsat will take all reasonable steps to eliminate such interference.

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

² See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01686, File Nos. SAT-RPL-20220414-00041 and SAT-AMD-20221006-00129 (Dec. 9, 2022) (Public Notice).

³ Galaxy 35 is equipped with two tunable command receivers and two tunable telemetry transmitters. The center command frequency on each receiver and transmitter is selectable via ground command in 100 kHz steps within the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency ranges.

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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 has internally coordinated operations of Galaxy 35 alongside Galaxy 11 (S2253), which will be collocated at the nominal 93° W.L. orbital location.⁴

With the exception of Galaxy 11, Galaxy 35 will not be located at the same orbital location as any other satellite or at an orbital location that has an overlapping station-keeping volume with any other satellite. Further, Intelsat is not aware of any other FCC-licensed system, any other system applied for and under consideration by the FCC, or of any system that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch having an overlapping station-keeping volume with Galaxy 35 at the nominal 93° W.L. location.

Grant of this STA request is in the public interest because the coverage at 93.1° W.L. will allow Intelsat to better meet its customer's desired C-band coverage than at 95.05° W.L.

For the reasons set forth herein, Intelsat respectfully requests that the FCC grant this request.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Merissa Velez
Jennifer Balatan

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice).