



April 13, 2022

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

Re: Request for Special Temporary Authority for Galaxy 35
Call Sign S3143

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), pursuant to Section 25.120 of the rules of the Federal Communications Commission ("Commission"),¹ herein requests Special Temporary Authority ("STA")² for 30 days, commencing immediately, to operate the Telemetry, Tracking and Command ("TT&C") frequencies of the Galaxy 35 satellite (Call Sign S3143) at 94.85° W.L.³ As Intelsat informed the Space Bureau by phone, Galaxy 35 was inadvertently positioned at the 94.85° W.L. orbital location.

Galaxy 35 is currently authorized to operate at the 95.05° W.L. orbital location.⁴ Galaxy 35 was launched on December 13, 2022. On March 12, 2023, following completion of in-orbit testing, the satellite was placed at 94.85° W.L.

Grant of this STA request is in the public interest. Galaxy 35 is currently located at the nominal 95° W.L. location and precisely at 94.85° W.L. where the satellite it is replacing, Galaxy 3C (S2381), is located pursuant to a grant of STA.⁵ The 95.05° W.L. location where Galaxy 3C and the Galaxy 35 replacement satellite are both permanently licensed to operate, meanwhile, is occupied by the Intelsat 30 (S2887) and Intelsat 31 (S2924) satellites. The spacecraft was co-located with Galaxy 3C instead of with Intelsat 30 and Intelsat 31.

¹ 47 C.F.R. § 25.120.

² Intelsat has filed this STA request, an FCC Form 159 and fee electronically.

³ Intelsat has a pending request for STA to relocate the satellite to 93.1° W.L. See Intelsat License LLC, Request for Special Temporary Authority to Drift Galaxy 35 to, and Operate at, 93.1° W.L., File No. SAT-STA-20230407-00078 (filed Apr. 7, 2023).

⁴ See *Policy Branch Information, Actions Taken*, Report No. SAT-01686, File Nos. SAT-RPL-20220414-00041, SAT-AMD-20221006-00129 (Dec. 9, 2022) (Public Notice).

⁵ See *Policy Branch Information, Actions Taken*, Report No. SAT-01708, File No. SAT-STA-20230303-00046 (Mar. 10, 2023) (Public Notice).

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Intelsat is currently operating only the following TT&C center frequencies on Galaxy 35 at 94.85° W.L.: 4195.4 MHz and 4199.25 MHz (space-to-Earth); and 6422.0 MHz and 6424.5 MHz (Earth-to-space).

Intelsat is not operating the communications payload 94.85° W.L. and has not received any reports of interference from the satellite's operation at that location. Intelsat will continue to take all practicable steps to ensure safe operation of the spacecraft and avoid causing harmful interference. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Galaxy 35 is not 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, except for the Galaxy 3C satellite. Intelsat is not aware of any other system licensed by the Commission, or any other system applied for and under consideration by the Commission, having an overlapping station-keeping volume with Galaxy 35 at the 94.85° W.L. orbital location. Intelsat is also not aware of any system with an overlapping station-keeping volume with Galaxy 35 that is the subject of an International Telecommunication Union filing that is either in orbit or progressing towards launch.

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

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Merissa Velez