



April 17, 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 17 to and Operate at
85.0° W.L.; Call Sign S2715

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, beginning on May 2, 2023, to drift Galaxy 17 (S2715) to, and operate at, 85.0° W.L. The drift to 85.0° W.L. is expected to be approximately 11 days.² Intelsat intends to file an application for permanent authority to operate at this new location.

The Galaxy 17 satellite is currently operating at 91.0° W.L.³ During the drift of Galaxy 17, Intelsat will only utilize 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 satellite's TT&C Galaxy 17's TT&C frequencies are as follows: 4197.125 MHz and 4198.875 MHz (space-to-Earth); and 5925.5 MHz and 6424.5 MHz (Earth-to-space).

Once on-station at 85.0° W.L., the satellite will utilize the above TT&C frequencies⁴ and the following communications frequencies: 11700-12200 MHz (space-to-Earth) and 14000-14500 MHz (Earth-to-space).

¹ Intelsat has filed this STA request, an FCC Form 312, and the applicable filing fee electronically via the International Bureau's Filing System.

² Intelsat will commence inclined orbit operations for Galaxy 17 upon leaving the nominal 91° W.L. orbital location.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00439, File Nos. SAT-AMD-20070123-00013 and SAT-RPL-20061219-00155 (Apr. 27, 2007) (Public Notice). See also *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01645, File No. SAT-MOD-20220523-00053 (July 1, 2022) (Public Notice) (seeking to extend the Galaxy 17 license term through January 31, 2024).

⁴ At 85.0° W.L. Intelsat is seeking to operate the Galaxy 17 TT&C frequencies under International Telecommunication Union ("ITU") Article 4.4. Intelsat has assessed the operational environment near 85.0° W.L. and there are currently no co-frequency operations in 3700-4200 MHz and 5925-6725 MHz within +/- 6 degrees. Intelsat's proposed C-band operations will be on a non-interference, non-protection basis and will conform with the Federal Communications Commission's ("FCC" or "Commission") rules governing operations vis-à-vis adjacent locations.

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 17's communications payload and TT&C frequencies at 85.0° W.L. in conformance with existing coordination agreements and the Commission's rules governing operations vis-à-vis adjacent locations. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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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. Galaxy 17 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. Intelsat is not aware of any FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 17 at the nominal 85.0° W.L. location, except for Intelsat's pending application for Intelsat 85 (S3112).⁵ Intelsat is also not aware of any system with an overlapping station-keeping volume with Galaxy 17 that is the subject of an ITU filing that is either in orbit or progressing towards launch.

Grant of this STA request is in the public interest because it will allow Intelsat to provide capacity from the nominal 85.0° W.L. orbital location.

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

Respectfully submitted,

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

cc: Merissa Velez
Jennifer Balatan

⁵ See Intelsat License LLC, as debtor-in-possession, Application for Authority to Launch and Operate Intelsat 85, a Ku/Ka-band Satellite, at 85.0° W.L., File No. SAT-LOA-20211207-00171, Call Sign S3112 (filed Dec. 7, 2021).