



April 24, 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 12 to 137.1° W.L.;
Call Sign S2422

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing May 15, 2023, to drift Galaxy 12 (S2422) to 137.1° W.L. The drift to 137.1° W.L. is expected to take approximately 40 days. Intelsat intends to file an application for permanent authority to operate at this new location.

The Galaxy 12 satellite is permanently licensed to operate at 129.0° W.L.² During the drift of Galaxy 12, 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. Galaxy 12's TT&C frequencies are as follows: 4198.0 MHz and 4199.875 MHz (space-to-Earth); and 6424.5 MHz (Earth-to-space).

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 12's communications payload and TT&C frequencies at 137.1° W.L. in conformance with existing coordination agreements and the Federal Communications Commission's ("FCC" or "Commission") 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.

Intelsat Stop Buzzer Contact: 24x7 Intelsat Network Operations Center: +1 404-381-2900
Director, Network Operations Center (NOC): Angela Wheeler
Address: 2875 Fork Creek Church Road · Ellenwood, GA 30294
Email: angela.wheeler@intelsat.com
Office: + 1 404-381-2820
Mobile: +1 202-437-1619

¹ Intelsat has filed this STA request, an FCC Form 312, a \$1,600.00 filing fee electronically via the International Bureau's Filing System.

² See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01535, File No. SAT-MOD-20200909-00106 (Mar. 12, 2021) (Public Notice).

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 12 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 12 at the nominal 137.1° W.L. location. Intelsat is also not aware of any system with an overlapping station-keeping volume with Galaxy 12 that is the subject of an International Telecommunication Union 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 new capacity from the nominal 137.0° 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
Kathryn Medley