



May 17, 2023

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

Re: Request for 60 Days of Special Temporary Authority to Operate Galaxy 35 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 upon grant but no later than May 25, 2023, to operate Galaxy 35 (S3134) at 93.1° W.L. in order to provide customer service.¹ Intelsat has filed an application to modify the Galaxy 35 license to operate at 93.1° W.L. on a permanent basis.²

Specifically, Intelsat seeks STA to operate the Galaxy 35 telemetry, tracking, and command ("TT&C") frequencies and C-band communications payload, 3700-4200 MHz (space-to-Earth)³ and 5925-6425 MHz (Earth-to-space),⁴ at 93.1° W.L. while the associated modification application is pending. In support of this request, Intelsat herein incorporates by reference the modification application.⁵

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$1,600.00 filing fee electronically via the International Bureau's Filing System.

² See Intelsat License LLC, Application to Modify Authorization for Galaxy 35 (S3143), File No. SAT-MOD-20230517-00112 (filed May 17, 2023) ("*Galaxy 35 Modification Application*").

³ Intelsat will operate the Galaxy 35 satellite in accordance with the Commission's *C-band Order* and Footnote NG182 of the U.S. Table of Frequency Allocations. See *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2391 ¶ 112 (2020); 47 C.F.R. § 2.106, NG182.

⁴ 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.

⁵ See *Galaxy 35 Modification Application*.

Galaxy 35 is authorized by license to operate at the 95.05° W.L. orbital location.⁶ Pursuant to STA,⁷ Intelsat relocated Galaxy 35 to 93.1° W.L., where it is collocated with Galaxy 11 (S2253), on April 26, 2023.

Grant of this STA request will not result in increased risk of harmful interference. 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.⁸ Should any harmful interference occur, Intelsat will take all reasonable steps to eliminate such interference.

Grant of this STA request is in the public interest because the coverage at 93.1° W.L. will allow Intelsat to provide C-band coverage to relocated customers while the associated modification application is pending.⁹

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

⁶ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01686, File Nos. SAT-RPL-20220414-00041, SAT-AMD-20221006-00129 (Dec. 9, 2022) (Public Notice).

⁷ See *Satellite Licensing Division and Satellite Programs and Policy Division Information; Actions Taken*, Report No. SAT-01720, File No. SAT-STA-20230407-00078 (Apr. 28, 2023) (Public Notice).

⁸ Intelsat has internally coordinated operations between Galaxy 11 and Galaxy 35.

⁹ See *Galaxy 35 Modification Application*.