May 19, 2023

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

Re: Request for 30 Days of Special Temporary Authority to Operate Galaxy 17 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, commencing upon grant but no later than May 26, 2023, to operate the Galaxy 17 satellite's (S2715) Ku-band beams at 85.0° W.L. over a new coverage area to meet customer demand in the Atlantic region during the summer season.

Specifically, Intelsat seeks to operate in the 11700-12200 MHz (space-to-Earth) and 14000-14500 MHz (Earth-to-space) bands over the coverages provided in Exhibit A (the "Atlantic Region Ku-band Coverage Areas"), which will be obtained by biasing the satellite platform. Intelsat additionally requests authority to utilize the following C-band frequencies[2] for telemetry, tracking, and command ("TT&C") at 85.0° W.L.: 4197.125 MHz and 4198.875 MHz (space-to-Earth); and 5925.5 MHz and 6424.5 MHz (Earth-to-space).[3]

Galaxy 17 is authorized by license to operate at the 91.0° W.L. orbital location[4] Pursuant to STA,[5] the satellite is providing customer service in the Ku-band and operating TT&C links in the C-band with a different coverage than sought herein. Intelsat filed an application to modify the Galaxy 17

[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] 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.

[3] Intelsat seeks to operate the C-band TT&C links pursuant to U.S. ITU filings USASAT-24U and USASAT-35Q, rather than under International Telecommunication Union ("ITU") Article 4.4.

[4] *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) ("*Galaxy 17 Authorization*").

[5] *See Satellite Licensing Division and Satellite Programs and Policy Division Information; Actions Taken*, Report No. SAT-01722, File No. SAT-STA-20230417-00091 (May 5, 2023). Intelsat intends for grant of this instant application to supersede the current STA authorization.

license to extend the license term through January 31, 2024,[6] which it subsequently amended to request authorization to (i) relocate Galaxy 17 from 91.0° W.L. to 85.0° W.L., and (ii) further extend the license term through January 31, 2029.[7] The Atlantic Region Ku-band Coverage Areas requested herein are different from the Ku-band beam coverages authorized under the existing license, existing STA authorization, or pending license modification application, as amended. Intelsat intends to use the coverages requested in the modification application later in the year.

Intelsat's proposed operation of Galaxy 17 will conform to existing coordination agreements and the Federal Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations. Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

The temporary operation of the satellite's Ku-band beams over the Atlantic Region Ku-band Coverage Areas will allow Intelsat to meet the immediate bandwidth need for seasonal customer demand. Accordingly, grant of this STA request is in the public interest.

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

Respectfully submitted,

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

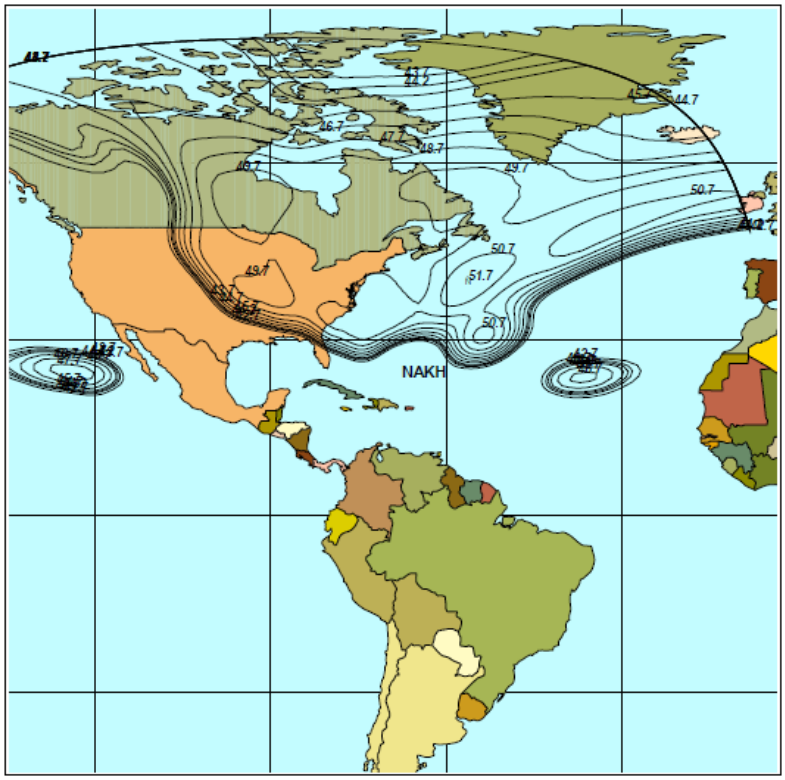
cc: Merissa Velez
Jennifer Balatan

[6] *See* Intelsat License LLC, Application to Modify Authorization for Galaxy 17, File No. SAT-MOD-20220523-00053 (filed May 23, 2022).

[7] *See* Intelsat License LLC, Application to Amend Pending Application to Modify Galaxy 17, File No. SAT-AMD-20230519-00118 (filed May 19, 2023).

Exhibit A

Proposed Ku-band Space-to-Earth Coverage Area



View : Geographic
Status : INTELSAT APPROVED

Plot Date: 19 May 2023
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Galaxy 17 @ 85°W

Ku-Band North America H

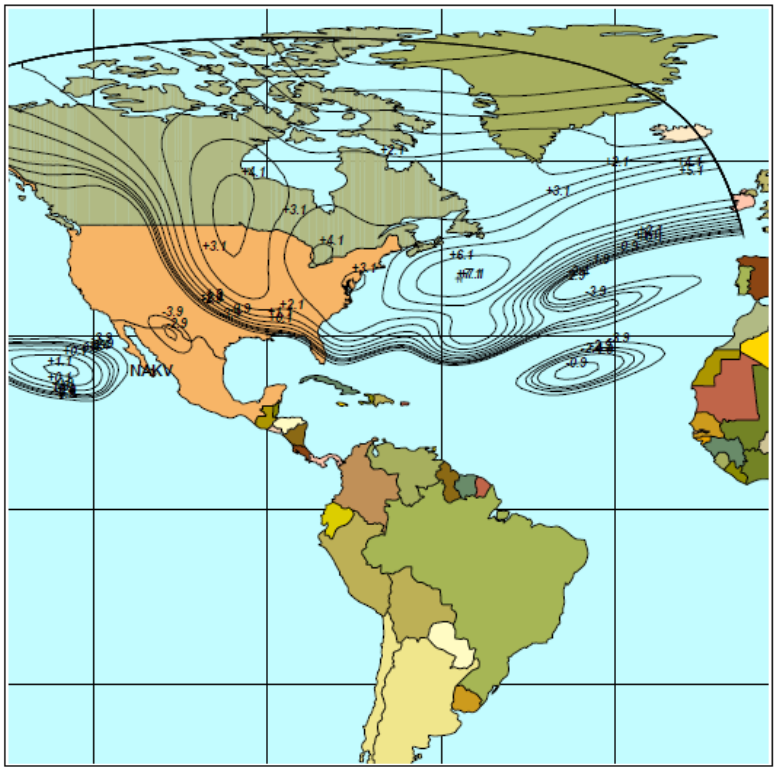
Transmit Coverage

Platform Bias:	2.00°E 0.70°N
Yaw:	0.00°

Contours	EIRP [dBW]
Beam Peak (0.0)	51.7
-1.0	50.7
-2.0	49.7
-3.0	48.7
-4.0	47.7
-5.0	46.7
-6.0	45.7
-7.0	44.7
-7.5	44.2
-8.0	43.7
-9.0	42.7

Beam Edge EIRP values from IESS-410 Rev 8B.
Nominal Beam Peak EIRP and contour values
(dB from B.E.) derived from ACP 202 Rev 6.10.

Proposed Ku-band Earth-to-Space Coverage Area



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Galaxy 17 @ 85°W

Ku-Band North America V

Receive Coverage

Platform Bias: 2.00°E 0.70°N
Yaw: 0.00°

Contours	G/T [dB/K]
Beam Peak (0.0)	7.1
-1.0	6.1
-2.0	5.1
-3.0	4.1
-4.0	3.1
-5.0	2.1
-6.0	1.1
-7.0	0.1
-8.0	-0.9
-9.0	-1.9
-9.5	-2.4
-10.0	-2.9
-11.0	-3.9

Beam Edge EIRP values from IESS-410 Rev 8B.
Nominal Beam Peak EIRP and contour values
(dB from B.E.) derived from ACP 202 Rev 6.10.

View : Geographic
Status : INTELSAT APPROVED

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