



June 8, 2023

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

Re: Request for Extension of Special Temporary Authority to Drift Galaxy 12 to
137.1° W.L.; Call Sign S2422

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 10 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat to drift Galaxy 12 (S2422) to 137.1° W.L.² Galaxy 12 began drifting on May 15, 2023, and is expected to arrive on-station at 137.1° W.L. by June 21, 2023.³ 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.⁴ During the drift of Galaxy 12, Intelsat is only utilizing the satellite's telemetry, tracking, and control ("TT&C") frequencies and is following 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 extension request will not result in increased risk of harmful interference. As noted above, Intelsat is operating only the above listed TT&C frequencies during the drift and is coordinating its TT&C transmissions with operators of satellites in the drift path. Should any harmful interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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

² See *Satellite Licensing Division and Satellite Programs and Policy Division Information; Actions Taken*, Report No. SAT-01726, File No. SAT-STA-20230424-00094 (May 19, 2023) (Public Notice).

³ Intelsat is separately seeking STA to operate at 137.1° W.L., see Intelsat License LLC, Request for Special Temporary Authority, File No. SAT-STA-20230508-00107 (filed May 8, 2023).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01535, File No. SAT-MOD-20200909-00106 (Mar. 12, 2021) (Public Notice).

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Grant of this STA extension 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 extension request.

Respectfully submitted,

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

cc: Merissa Velez
Jennifer Balatan
Stephen Duall
Jay Whaley