



**INTELSAT.**

*Envision. Connect. Transform.*

April 11, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Request for Special Temporary Authority  
Mountainside, Maryland Earth Station KA275  
**Expedited Treatment Requested**

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”), herein requests expedited Special Temporary Authority (“STA”)<sup>1</sup> for 30 days beginning immediately to use its Mountainside, Maryland C-band earth station—call sign KA275—to provide telemetry, tracking, and command (“TT&C”) services for the IntelSat 29e satellite (Call Sign S2913) as IntelSat takes all practicable steps to regain control of the satellite. The TT&C operations will be performed in the following frequencies: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, and 3702.75 MHz in the uplink; and 5850.5 MHz, 5853.0 MHz, 6422.0 MHz, and 6424.5 MHz in the downlink.

As IntelSat informed the International Bureau, IntelSat 29e has left its station-keeping box after experiencing back-to-back anomalies.<sup>2</sup> On April 7, 2019, IntelSat 29e experienced a fuel leak that caused the satellite to lose earth lock. IntelSat was in the process of recovering earth lock when another anomaly of unknown origin occurred on April 9, 2019. Due to these back-to-back anomalies, the IntelSat 29e satellite is no longer responding to commands and has drifted outside of its authorized +/- 0.05° East/West station-keeping box. The satellite is not transmitting.

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<sup>1</sup> IntelSat has filed this STA request, an FCC Form 159 and an \$210.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> See *IntelSat License LLC, Request for 30-day Station-Keeping STA for IntelSat 29e (S2913)*, File No. SAT-STA-20190410-00025 (stamp grant issued Apr. 10, 2019, by Stephen J. Duall).

To the extent necessary, Intelsat requests a waiver of 47 C.F.R. §§ 25.120(a) and 25.130(b)(1) of the Federal Communications Commission's ("FCC" or "Commission") rules. Section 25.120(a) requires an STA request to be received by the Commission at least three working days prior the start of proposed operations;<sup>3</sup> and Section 25.130(b)(1) requires applicants to provide a frequency coordination analysis.<sup>4</sup>

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.<sup>5</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>6</sup> In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>7</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists in this case based on hardship. Due to the sudden and unexplained anomalies on the Intelsat 29e satellite, Intelsat is unable to comply with the requirements of §§ 25.120(a) and 25.130(b)(1) of the Commission's rules. Intelsat will, however, take all practicable steps to regain control of the satellite and avoid causing interference in doing so. Intelsat will be contacting operators of satellites that could be impacted by the current drift of the satellite and is coordinating with terrestrial operators.

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<sup>3</sup> 47 C.F.R. § 25.120(a).

<sup>4</sup> 47 C.F.R. § 25.130(b)(1).

<sup>5</sup> 47 C.F.R. § 1.3.

<sup>6</sup> *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

<sup>7</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this STA request. Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Paul Blais  
Stephen Duall