

March 12, 2014



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

Re: Request for Extension of Special Temporary Authority for
Galaxy 26
Call Sign: S2469

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 30-day extension – beginning March 20, 2014 – of Special Temporary Authority (“STA”)¹ previously granted Intelsat to operate the Galaxy 26 satellite in the C- and Ku-bands at 49.9° E.L., where the satellite is currently located, pursuant to the ITU filings of the Turkish Administration for that location.²

On February 18, 2014, Intelsat began drifting the Galaxy 26 satellite from 50.0° E.L. to 49.9° E.L. pursuant to STA, because the operator of Turksat-4A is conducting in-orbit testing of that satellite at precisely 50.0° E.L.³ Prior to Galaxy 26’s move from 50.0° E.L. to 49.9° E.L., the Commission granted Intelsat STA to operate Galaxy 26’s TT&C and payload frequencies at 50.0° E.L. for 30 days beyond the end of the satellite’s March 15, 2014 license term in order to ensure that Intelsat’s U.S. Government customers served by Galaxy 26 have time to transition to a new satellite.⁴ Intelsat herein seeks similar authority for the Galaxy 26 satellite at 49.9° E.L.

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² *See Policy Branch Information; Actions Taken*, Report No. SAT-00998, File No. SAT-STA-20140212-00022 (Feb. 21, 2014) (Public Notice) (“the Galaxy 26 Drift Authority”).

³ *See id.*

⁴ *See Intelsat License LLC, Request for Special Temporary Authority for Galaxy 26 Call Sign: S2469*, File No. SAT-STA-20140123-00009 (filed Jan. 23, 2014) (stamp grant, Feb. 12, 2014) (the “Galaxy 26 STA for 50.0° E.L.”). Intelsat subsequently surrendered the Galaxy 26 STA for 50.0° E.L. following Galaxy 26’s move to 49.9° E.L. *See Letter*

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The specific TT&C frequencies of the satellite are as follows:

Primary command: 5926.5 MHz (RHCP) (uplink)
Back-up command: 6411 MHz (RHCP) (uplink)
Telemetry: 4196.5 MHz (V) or 4199.5 MHz (V)
Ranging: 6315 MHz (V) (uplink)
 4090 MHz (H) (downlink)

The specific communications payload frequencies of the satellite are as follows:

14000-14500 MHz (uplink)
11700-12200 MHz (downlink)⁵

As the Commission is aware, Intelsat had planned to de-orbit Galaxy 26 at the end of its original license term of March 15, 2014 from its 50.0° E.L. orbital location. Prior to de-orbit, the U.S. Government customers currently served by Galaxy 26 were scheduled to move to the ABS-2 satellite (a/k/a ST-3 and Koreasat-8), which originally had been scheduled to launch in January 2014. However, the ABS-2 satellite launch was delayed until February 6, 2014. As a result of this delay, absent the Commission granting this STA extension request, the U.S. Government customers would experience service interruption upon the expiration of the Galaxy 26 Drift Authority term on March 19, 2014 until the ABS-2 satellite becomes fully operational a short time thereafter.⁶ The ABS-2 satellite is currently undergoing in-orbit

from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Feb. 20, 2014). Pursuant to the Galaxy 26 Drift Authority, the satellite is authorized to operate at 49.9° E.L. through March 19, 2014, which is why Intelsat is seeking a 30-day STA from the March 20, 2014 date. *See* Galaxy 26 Drift Authority.

⁵ Intelsat will continue to comply with the conditions previously imposed on the operation of the Galaxy 26 satellite in the 11700-12200 MHz frequency band. *See Policy Branch Information; Actions Taken*, Report No. SAT-00613, File No. SAT-MOD-20090309-00034 (June 19, 2009) (Public Notice).

⁶ Intelsat currently expects to transfer the U.S. Government customers to ABS-2 by the end of March. Intelsat has requested temporary

testing, and is expected to be fully operational sometime in late March. Consequently, Intelsat herein requests that the Commission authorize Intelsat temporarily to continue operating the Galaxy 26 satellite in the aforementioned frequency bands at 49.9° E.L. until April 19, 2014 to ensure continuity of service.

Intelsat requests that the waiver of Section 25.202(g) previously granted Intelsat for Galaxy 26 at 49.9° E.L. continue to apply through the expiration of this STA. At the 49.9° E.L. location, Intelsat will continue to comply with the condition previously imposed on its operation of Galaxy 26's TT&C operations at 50.0° E.L.⁷ At the conclusion of this STA on April 19, 2014, Intelsat plans to de-orbit the satellite as previously approved by the Commission.⁸

Grant of this STA request is in the public interest because it will allow Intelsat to continue to provide U.S. Government customers with capacity in the Indian Ocean until they can be transferred to ABS-2. Grant of this STA request will not result in risk of harmful interference as Intelsat will continue to operate Galaxy 26 pursuant to the coordination agreements of the Turkish Administration for the 49.9° E.L. location.⁹

operational authority through April 19, 2014 to accommodate possible slippage in the traffic transfer schedule.

⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00613, File No. SAT-MOD-20090309-00034 (June 19, 2009) (Public Notice).

⁸ See *Policy Branch Information; Actions Taken*, Report No. SAT-00851, File No. SAT-MOD-20110420-00073 (Mar. 9, 2012), Engineering Statement at 6-7. Intelsat confirmed that it expects to dispose of the spacecraft by moving it to a planned minimum altitude of 150 kilometers (perigee) above the geostationary arc. Intelsat has reserved 63.5 kilograms of fuel for this purpose. The fuel gauging uncertainty has been taken into account in these calculations.

⁹ Intelsat previously filed a letter from Türksat Satellite Communication Cable TV and Operation Inc. confirming Intelsat's authority to operate a satellite at 50.0° E.L. pursuant to ITU filings of the Government of Turkey. See *Supplement to Application to Modify Authorization to Relocate Galaxy 26 to 50.0° E.L.*, File No. SAT-MOD-20110420-00073 (filed June 8, 2011).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", with a large, stylized flourish at the end.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Kathryn Medley
Stephen Duall
Jay Whaley
Cindy Spiers