

May 2, 2018

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

Re: Request for Special Temporary Authority to Drift Intelsat 5 to, and Operate at, 137.0° W.L.  
Call Sign: S2704  
**EXPEDITED TREATMENT REQUESTED**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 30 days of expedited Special Temporary Authority (“STA”),<sup>1</sup> commencing upon grant, to drift Intelsat 5 (Call Sign S2704) to 137.0° W.L. and operate the satellite at 137.0° W.L.

Subject to receipt of Federal Communications Commission (“FCC” or “Commission”) approval, the satellite will be relocated to 137.0° W.L. Intelsat 5 is currently drifting to 93.2° W.L.<sup>2</sup> and its permanently licensed location is 156.9° E.L.<sup>3</sup> The drift to 137.0° W.L. should be completed by the end of May. Intelsat is seeking expedited treatment because, given the redeployment change, Intelsat will need to begin stop drift maneuvers for 137.0° W.L. on May 29, 2018.

The FCC recently made available for reassignment the C-band frequencies at 137° W.L.,<sup>4</sup> which provides a new opportunity for the Intelsat 5 satellite. Intelsat has filed to modify the authorization for the Intelsat 5 satellite to redeploy Intelsat 5 to 137.0° W.L.<sup>5</sup> In support of this relocation, Intelsat concurrently will be requesting 180 days of STA. During the drift of the Intelsat 5 satellite from 156.9° E.L. to 137.0° W.L., Intelsat will continue to only utilize only the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will follow

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$945.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> See File No. SAT-STA-20180410-00027 (granted Apr. 13, 2018).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01236, File No. SAT-MOD-20170331-00057 (May 5, 2017).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01313 (Apr. 27, 2018).

<sup>5</sup> See *Intelsat License LLC Modification of Authorization to Redeploy to, and Operate Intelsat 5 (S2704) at 137.0 W.L.*, File No. SAT-MOD-20180501-00036 (filed May 1, 2018).

industry practices for coordinating TT&C transmission during the relocation process. The specific TT&C frequencies are as follows: 14498 MHz (H) and 13999 MHz (RHCP) in the uplink; and 11451 MHz (H, V, and RHCP), 11452 MHz (H, V, and RHCP), and 11454 MHz (RHCP, and LHCP) in the downlink.

Once located at 137.0° W.L., Intelsat will also operate on the following communications frequencies: 5925-6425 MHz, 12750-13250 MHz, and 14000-14250 MHz in the uplink; and 3700-4200 MHz, 10700-10950 MHz, 11200-11450 MHz, and 11450-11700 MHz in the downlink.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 137.0° W.L., Intelsat will operate the communications payload in conformance with FCC rules and any relevant coordination agreements.

Further, Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 5 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 5 at 137.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

In addition, Intelsat requests that the waiver previously granted to Intelsat 5 at 156.9° E.L. be extended to the satellite at 137.0° W.L. Specifically, Intelsat requests that the waiver of Section 25.114(c)(4)(vi)(A) of the FCC's rules, requiring applicants to provide predicted space station antenna gain contours for each transmit and receive antenna beam requested, previously granted for Intelsat 5 be extended to the satellite at 137.0° W.L.<sup>6</sup>

Grant of this STA request is in the public interest because it will allow Intelsat to provide new capacity from the 137.0° W.L. orbital location.

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<sup>6</sup> See 47 C.F.R. § 25.114(c)(4)(vi)(A); *Application of Intelsat License LLC to Modify Authorization for Intelsat 5 (S2704)*, Stamp Grant, File No. SAT-MOD-20170331-00057, Condition 9 (May 4, 2017).

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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 supplement to the undersigned at (703) 559-6949.

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers