



March 13, 2023

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

Re: Request for Further 60-day Extension of Special Temporary Authority to Operate
Intelsat 5 at 166.15° E.L.; Call Sign: S2704
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days of Special Temporary Authority ("STA"),¹ beginning March 12, 2023, to operate Intelsat 5 (S2704) at 166.15° E.L.² Intelsat has filed an application for permanent authority to operate at this new location.³

On-station at 166.15° E.L., Intelsat 5 is nominally collocated with Intelsat 19 (S2850). Intelsat 5's frequencies are as follows:

- Telemetry, tracking, and control ("TT&C"):
 - 11.451 GHz, 11.452 GHz, and 11.454 GHz (space-to-Earth);
 - 13.999 GHz and 14.498 GHz (Earth-to-space).
- Communications:
 - 3700-4200 MHz, 10.70-10.95 GHz, 11.20-11.45 GHz and 11.45-11.7 GHz (space-to-Earth);
 - 5925-6425 MHz, 12.75-13.25 GHz, and 14.0-14.25 GHz (Earth-to-space).

The approximate coverage area of Intelsat 5 at 166.15° E.L is attached as Exhibit A.

Grant of this further STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 5 in conformance with relevant coordination agreements concerning the nominal 166° E.L. location and the Federal

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 See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01701, File No. SAT-STA-20220907-00101 (Feb. 17, 2023) (Public Notice). Per condition 6 of the stamp grant, Intelsat has filed a modification application for permanent authority to operate at 166.15° E.L. See Intelsat License LLC, Application to Modify Authorization for Intelsat 5, File No. SAT-MOD-20230308-00050 (filed Mar. 8, 2023).

³ See Intelsat License LLC, Application to Modify Authorization for Intelsat 5, File No. SAT-MOD-20230308-00050 (filed Mar. 8, 2023).

Ms. Marlene H. Dortch
March 13, 2023
Page 2

Communications Commission's ("FCC") rules governing operations vis-à-vis adjacent locations. Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

Additionally, Intelsat respectfully requests waiver of the three-day prior filing requirement for STA.⁴ The prior STA expired on March 11, 2023,⁵ but due to an administrative oversight, timely filing of the extension request of that STA was inadvertently missed. Intelsat has taken measures to avoid this error in the future. The Commission may grant a waiver for good cause shown.⁶ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁷ 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.⁸ Grant of the requested waiver would serve the public interest by ensuring uninterrupted operations of Intelsat 5 at the 166.15° E.L. orbital location.

Grant of this expediated further STA extension request is in the public interest because it will allow Intelsat to continue providing additional capacity from the nominal 166° E.L. orbital location.

Please direct any questions to the undersigned at (703) 559-7799.

Respectfully submitted,

/s/ W. Ray Rutngamlug
W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

cc: Alyssa Roberts
Jennifer Balatan
Jay Whaley

⁴ See 47 C.F.R. § 25.120(a).

⁵ See *supra*, n. 2.

⁶ 47 C.F.R. § 1.3.

⁷ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁸ *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

EXHIBIT A
Intelsat 5@166.15°E Japan Ku-band space-to-Earth Coverage

