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*with conditions

November 29, 2010

File # SAT-LOA-20100726-00167

Call Sign S2814 Grant Date 12/16/10

(or other identifier)

Term Dates

From 12/17/10 To: 01/15/11

Approved:

Stephen J. Duall
 Stephen J. Duall
 Chief, Satellite
 Policy Branch

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VIA IBFS

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

Re: Intelsat North America LLC
 IBFS File No. SAT-LOA-20100726-00167; Call Sign S2814

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”), by its attorney, hereby requests a 30-day extension of time—from December 17, 2010 through January 15, 2011—to satisfy the bond condition specified in paragraph 18 of the Federal Communications Commission’s (“Commission”) grant of the above-referenced application relating to the Intelsat 17 space station (call sign S2814). The requested extension is consistent with Commission precedent, and will facilitate Intelsat’s ability to demonstrate compliance with the conditions with minimal administrative burden.

The International Bureau authorized, with conditions, Intelsat to launch and operate the Intelsat 17 satellite on November 17, 2010.¹ Paragraph 18, subpart b, of the grant addresses bond matters relating to Intelsat 17. Specifically, the subpart provides that:


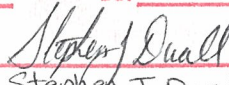
Intelsat must file a bond with the Commission in the amount of \$750,000, pursuant to the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003), within 30 days of the date of this grant (December 17, 2010).²

¹ See *Policy Branch Information; Actions Taken*, Report No. SAT-00739, IBFS File No. SAT-LOA-20100726-00167 (Nov. 19, 2010) (Public Notice).

² *Id.* at ¶ 13.b.

**Attachment to Grant
Intelsat North America LLC
IBFS File No. SAT-LOA-20100726-00167**

The request of Intelsat North America LLC (Intelsat North America) for a 30-day extension of the deadline, from December 17, 2010 through January 15, 2011, to file a bond in the amount of \$750,000 for the Intelsat 17 space station (Call Sign S2814) is granted. Intelsat 17 was launched on November 26, 2010, is currently undergoing in-orbit testing at the 63.15° E.L. orbital location (*see* IBFS File No. SAT-STA-20101012-00214, granted Dec. 2, 2010), and is expected to commence operations at the assigned 66° E.L. orbital location by January 13, 2011. In light of the launch of the Intelsat 17 space station and the expectation of imminent commencement of operations at the assigned 66° E.L. orbital location, the requirement to file a bond for Call Sign S2814 pursuant to condition 18.b. of the Intelsat 17 authorization (IBFS File No. SAT-LOA-20100726-00167, granted November 17, 2010) will no longer apply if the following events occur before the extended bond filing deadline of January 16, 2011: (a) Intelsat North America files a certification that the Intelsat 17 space station has begun operations at its assigned orbital location consistent with the terms and conditions of authorization, and (b) the Commission determines that the last milestone has been satisfied. This grant does not otherwise affect in any way any other terms and conditions to the authorization for the Intelsat 17 space station.

 GRANTED* International Bureau *with conditions	File # <u>SAT-LOA-20100726-00167</u>
	Call Sign <u>S2814</u> Grant Date <u>12/16/10</u> (or other identifier)
	Term Dates From <u>12/17/10</u> To: <u>01/15/11</u>
	Approved: <u></u> Stephen J. Duall Chief, Satellite Policy Branch



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Intelsat launched the Intelsat 17 satellite on November 26, 2010. Following the launch, Intelsat plans to conduct in-orbit testing on Intelsat 17.³ Assuming no anomalies occur, Intelsat expects testing to be completed and the Intelsat 17 space station to commence operations at its assigned orbital location by January 13, 2011. An affidavit attesting to the facts relating to the launch and planned commencement of operations is attached hereto as Annex 1.

Intelsat requests that the Commission extend the bond due date for 30 days, from December 17, 2010 until January 15, 2011. The bond requirement was first incorporated into the satellite licensing process by the Commission to replace its previous financial qualification requirements.⁴ The underlying purposes of the bond requirement are to “help deter speculative satellite applications, and help expedite provision of service to the public.”⁵ Given that the Intelsat 17 satellite has been launched and is expected to begin operations by January 13, 2011, the requested extension would be consistent with the stated purposes of the bond requirement.⁶

In addition, the requested extension would be consistent with Commission precedent, in which extensions have been granted under very similar factual circumstances involving the launch of a satellite shortly following authorization.⁷

³ *Intelsat North America LLC, Request for Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 17; Call Sign: S2814*, IBFS File No. SAT-STA-20101012-00214 (filed Oct. 12, 2010).

⁴ *See Amendment of the Commission’s Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760, 10825 ¶ 167 (2003) (“*First Space Station Reform Order*”).

⁵ *Id.*

⁶ *See id.* Intelsat also notes that Intelsat 17 contains all of the same frequencies that were previously authorized on Intelsat 702 in addition to three new frequency bands, making it akin to a replacement for that satellite. The Commission has determined that the bond requirement is altogether unnecessary in the case of replacement satellites, as these applications are “intended to continue service, and would not be filed for speculative purposes.” *Id.*

⁷ *See SES Americom, Inc. and SES Satellites (Gibraltar) Ltd., Request for Extension of Time*, IBFS File No. SAT-ASG-20080609-00120 (stamp grant Sept. 5,



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Consistent with this precedent, Intelsat respectfully requests that the bond posting requirement will no longer apply if the following events occur before the extended bond filing deadline of January 15, 2011: (1) Intelsat North America files a certification that the Intelsat 17 space station has begun operations at its assigned orbital location consistent with the terms and conditions of authorization; and (b) the Commission determines that the last milestone has been satisfied. Toward this end Intelsat will file the required notice immediately following the satellite's commencement of operations—currently expected on Thursday January 13, 2011—and respectfully requests that the Commission, no later than Friday January 14, 2011, determine that the last milestone has been satisfied.

For the foregoing reasons, Intelsat requests a 30-day extension of time to satisfy the bond requirement of paragraph 18 of the grant.

Respectfully submitted,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel for Intelsat North America LLC

cc: Robert Nelson
Karl Kensinger
Stephen J. Duall

2008) ("SES Grant"); *Intelsat North America LLC, 30-Day Bond Filing Extension for Intelsat 15; Call Sign S2789*, IBFS File No. SAT-LOA-20090410-00043 (filed Dec. 15, 2009) (stamp grant Dec. 23, 2009).

ANNEX 1

DECLARATION OF TOBIAS NASSIF

I, Tobias Nassif, Vice President, Satellite Operations and Engineering, hereby certify under penalty of perjury as follows:

The Intelsat 17 space station was successfully launched on November 26, 2010. The space station is currently being maneuvered to 63.15° E.L. where in-orbit testing of the satellite is scheduled to begin on December 7, 2010. Assuming no anomalies occur, testing is expected to be completed, and the satellite drifted to its assigned orbital location of 66.0° E.L., by January 1, 2011. Operation of Intelsat 17 at 66.0° E.L. is currently expected to begin on January 13, 2011.

/s/ Tobias Nassif
Tobias Nassif
VP, Satellite Operations and
Engineering
Intelsat Corporation

Dated: 29 November, 2010