

May 10, 2010

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



Re: Request for Special Temporary Authority to Drift and Operate Intelsat 801, Call Sign S2391

Intelsat North America LLC (“Intelsat”) herein supplements the above-referenced pending request for a 60-day extension of its Special Temporary Authority (“STA”) to drift and operate Intelsat 801 (call sign S2391) at 29.5° W.L.¹ Intelsat seeks to include in its STA extension request a request for waiver of Section 25.210(j) of the Commission’s rules² to permit Intelsat to operate the Intelsat 801 satellite at 29.5° W.L with an East/West station-keeping tolerance of +/- 0.09°.

Intelsat has included this same request for waiver of Section 25.210(j) in a pending amendment to its request for modification of authorization to operate Intelsat 801 at 29.5° W.L.³ The information to support grant of the requested waiver in the amendment has not changed and is incorporated by reference.⁴ As explained in the amendment, good cause exists for granting a waiver of Section 25.210(j). Expansion of the station-keeping box to +/- 0.09° will decrease the frequency of the satellite’s station-keeping maneuvers, allowing Intelsat to ensure safe station-keeping of the co-located Intelsat 801 and Intelsat 705 (call sign S2395) satellites. The proposed change will not result in harmful interference to adjacent satellite operators. Furthermore, grant of the waiver will not affect the station-keeping of any other spacecraft. No objections have been filed since Intelsat’s request for amendment was put on Public Notice.

All of the technical information for the Intelsat 801 satellite already on file with the Commission has not changed and is incorporated by reference.⁵

¹ See *Request for Extension of STA to Drift and Operate Intelsat 801 at 29.5° W.L.*, File No. SAT-STA-20100416-00079 (filed Apr. 16, 2010).

² 47 C.F.R. § 25.210(j).

³ See *Intelsat North America LLC, Amendment to Modification to Relocate Intelsat 801 and Operate at 29.5 W.L.*, File No. SAT-AMD-20100316-00050 (filed Mar. 16, 2010); *Intelsat North America LLC, Application to Modify Authorization for Intelsat 801 (S2391)*, File No. SAT-MOD-20100208-00024 (filed Feb. 8, 2010).

⁴ *Id.*

⁵ *Intelsat North America LLC, Application to Modify Authorization for Intelsat 801 (S2391)*, File No. SAT-MOD-20100208-00024 (filed Feb. 8, 2010).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant Intelsat's pending STA extension request as supplemented with this request for waiver.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall