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Wiley Rein & Fielding LLP



October 22, 2002

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission
 236 Massachusetts Avenue, N.E. Suite 110
 Washington, D.C. 20002

Re: Request for Special Temporary Authority for INTELSAT 602
 E.II Sign: S2389

Dear Ms. Dortch:

Intelsat LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days to immediately begin drifting INTELSAT 602 to 32.9° E.L. and to begin operating at that location in early December. INTELSAT 602 is being moved to 32.9° E.L. in order to satisfy customer service requests at that location that were temporarily deferred in order to move INTELSAT 601 from 32.9° E.L. to 64.25° E.L.² INTELSAT 601 was moved in order to satisfy an immediate need for service on an inclination-controlled satellite at 64.25° E.L. by the United States Government. INTELSAT 602 is currently operating at 64.25° E.L. in inclined orbit. Intelsat is currently drifting INTELSAT 601 to 64.25° E.L. pursuant to STA.³ After the transfer of traffic from INTELSAT 602 to INTELSAT 601, Intelsat will begin drifting INTELSAT 602 to 32.9° E.L. in order to complete the satellite swap. On October 15, 2002, Intelsat filed applications to modify the licenses of these two satellites.⁴

¹ Intelsat has filed this STA request, an FCC Form 159 and a \$670.00 filing fee electronically via the International Bureau's Filing System.

² See 47 C.F.R. §25.120(b) (allowing applicants to apply for STA when there is an immediate need for use of facilities and granting such requests when the delay in the institution of "temporary operations would seriously prejudice the public interest").

³ See Request for Special Temporary Authority for INTELSAT 601, File No. SAT-STA-20021002-00176 (filed Oct. 2, 2002) (verbal grant issued by Jennifer Gilsenan, FCC, to Jennifer Hindin, Wiley Rein & Fielding LLP, on Oct. 3, 2002).

⁴ See Further Amendment to Application of Intelsat LLC to Modify Authorization (filed Oct. 15, 2002) (seeking to amend license for Intelsat LLC to Modify Authorization (filed Oct. 15, 2002); Amendment to Application of Intelsat LLC to Modify Authorization (filed Oct. 15, 2002) (seeking to amend license for INTELSAT601).

File # SAT-STA-00-2002-0192
 Grant 10/31/02
 Term 10/31/02
 John F. Papandrea
 202.719.7588
 papandr@wrf.com
 Approved [Signature]
 with attached copy of [Signature]

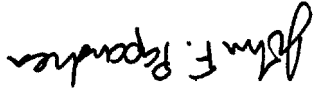
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Grant of this STA request will serve the public interest by completing the satellite swap that ^{MBS} performed in order to satisfy an immediate United States Government demand for service at the 64.25° E.L. location. Specifically, grant of this request will allow Intelsat to satisfy customer requests for service at 32.9° E.L. that were temporarily deferred in order to accommodate the U.S. Government. In addition, grant of this STA request will not result in increased risk of harmful interference. The INTELSAT 601 and INTELSAT 602 satellites are technically identical. The inclined orbit operation of INTELSAT 602 at 32.9° E.L. pursuant to STA also will be in conformance with coordination agreements for that location.

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

Sincerely,



John F. Papandrea

cc: Tom Tycz
Jennifer Gilsenan
John Martin
Jabin Vahora
Scott Kotler

ATTACHMENT

Today, we grant Intelsat LLC's request for Special Temporary Authority¹ for a period of 30 days, to immediately begin drifting its INTELSAT 602 satellite from its current location at 64.25° E.L. to 32.9° E.L., subject to the following conditions:

- 1) During the drift of the satellite from 64.25° E.L. to 32.9° E.L., Intelsat LLC shall not operate the communications payload on its INTELSAT 602 satellite; and
- 2) Intelsat LLC shall coordinate its TTC&M operations with existing geostationary satellites to ensure that no unacceptable interference results from its TTC&M operations during its drift operations; and
- 3) Any actions taken as a result of the drift authority ARE SOLELY AT INTELSAT LLC'S OWN RISK; and
- 4) This Special Temporary Authority is granted without prejudice to our final determination of Intelsat LLC's underlying modification application.²

¹ See Request for Special Temporary Authority for INTELSAT 602, File No. SAT-STA-20021022-00190, S2389, (filed October 22, 2002). See also Request for Special Temporary Authority for INTELSAT 601, File No. SAT-STA-20021002-00176, S2392, (filed October 2, 2002). (Intelsat LLC was given authority to drift its INTELSAT 601 satellite from 33.0° E.L. to 64.25° E.L., verbal grant issued by Jennifer Gilsenan, FCC, Satellite Policy Branch Chief, to Jennifer Hindin, Wiley, Rein, & Fielding LLP, on October 3, 2002). In order to best serve the recent, immediate need for service by the United States Government, Intelsat LLC has filed two corresponding STA requests and Modification applications for its INTELSAT 601 and INTELSAT 602 satellites. In essence Intelsat LLC seeks to swap orbital locations for both satellites, by which INTELSAT 601 will operate at 64.25° E.L. and INTELSAT 602 will operate at 32.9° E.L.

² See Further Amendment to Application by Intelsat 773 to Modify Authorization. (Filed October 15, 2002) (Seeking to amend the license for its Intelsat 602). See also Further Amendment to Application by Intelsat LLC to Modify Authorization. (Filed October 15, 2002) (seeking to amend the license for its INTELSAT 601 satellite).