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November 21, 2002

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**BY HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, DC 20002

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing  
INTELSAT 907  
Call Sign: S2411

Dear Ms. Dortch:

Intelsat LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 60 days from February 18, 2003 through April 19, 2003 to allow in-orbit testing of INTELSAT 907 at 25.75° W.L. INTELSAT 907 is scheduled to be launched on February 12, 2003. In support of its request, Intelsat submits the following information.

On August 8, 2000, the Federal Communications Commission ("Commission") granted Intelsat authority to launch and operate INTELSAT 907 at 31.5° W.L.<sup>2</sup> On September 18, 2002, Intelsat filed an application to modify the license for INTELSAT 907 to permit deployment of the satellite at 27.5° W.L.<sup>3</sup> That application is pending.

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

<sup>2</sup> See *Applications of Intelsat LLC For Authority to Operate, and to Further Construct, Launch and Operate C-Band and Ku-Band Global Satellites That Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460 (2000) (Memorandum Opinion Order and Authorization) ("Intelsat LLC Order"), recon. denied, 15 FCC Rcd 25234 (2000) (Order on Reconsideration). This authority became effective upon the July 18, 2001 transfer of satellite assets from INTELSAT, the intergovernmental organization, to Intelsat and the transfer of INTELSAT's associated ITU network filings to U.S. registry. See *Intelsat LLC Order*, 15 FCC Rcd at 15519.

<sup>3</sup> See *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00127, File No. SAT-MOD-20020918-00183 (Oct. 30, 2002) (Public Notice).

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Ms. Marlene H. Dortch

November 21, 2002

Page 2

The 25.75° W.L. orbital location is the same one used to conduct in-orbit testing of INTELSAT 905.<sup>4</sup> As with INTELSAT 905, Intelsat has coordinated the planned in-orbit testing of INTELSAT 907 with Hispasat, the operator of a nearby satellite at 30° W.L., as well as with Russia, which holds ITU filings for -- but has no operational satellites at -- nearby locations, including 25° W.L. and 26.5° W.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

The in-orbit testing of INTELSAT 907 at 25.75° W.L. is a critical step in ensuring that the satellite will be fully operational at 27.5° W.L. This, in turn, will ensure continuity of existing services at that location, and thereby promote the public interest.

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

Sincerely,



Jennifer D. Hindin

cc: Tom Tycz  
Jennifer Gilsonan  
Jabin Vahora  
Sylvia Lam

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<sup>4</sup> See *Intelsat LLC Request for Special Temporary Authority to In-Orbit Test INTELSAT 905 at 25.75° W.L.*, File No. SAT-STA-20020416-00057 (Apr. 16, 2002) (stamp grant by Jennifer Gilsonan, Branch Chief, Satellite Policy Branch, FCC, issued June 4, 2002).