



File # SAT-STA-20031208-00348  
with Attached Conditions  
Call sign 52388 Grant Date 2/11/2004

Approved by OMB  
3060-0678

From 12/13/2003 To 1/12/2004  
Term Date

*Robert G. Nelson*  
Chief Satellite  
Engineering Branch

Date & Time Filed: Dec 8 2003 12:08:09:156PM  
File Number: SAT-STA-20031208-00348  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Intelsat LLC Request for STA to Operate INTELSAT 702 at 54.85 E.L.

1. Applicant

<b>Name:</b>	Intelsat LLC	<b>Phone Number:</b>	202-944-7225
<b>DBA Name:</b>		<b>Fax Number:</b>	202-295-3278
<b>Street:</b>	3400 International Drive, N.W.	<b>E-Mail:</b>	milenko.stojkovic@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Dr. Milenko Stojkovic		

**ATTACHMENT**  
**Call Sign S2388**  
**SAT-STA-20031208-00348**

We grant Intelsat LLC's ("Intelsat") request for an extension of special temporary authority<sup>1</sup> to continue conducting the transfer of traffic from its INTELSAT 702 satellite, currently located at the 54.85° E.L. orbital location, to the INSAT 3E satellite, for the period of December 13, 2003 to January 12, 2004 subject, to the terms, conditions, and technical specifications set forth in its application and this Attachment.<sup>2</sup>

- 1) Intelsat shall coordinate all of its operations with existing geostationary satellites to ensure that no unacceptable interference results from these operations; and
- 2) Intelsat is required to accept interference from other lawfully operating in-orbit satellites; and
- 3) Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk; and
- 4) During Intelsat's operations at 54.85° E.L., no harmful interference shall be caused by INTELSAT 702 to any other lawfully operating in-orbit satellite. In the event of any harmful interference as a result of Intelsat's operations at 54.85° E.L., Intelsat shall cease operations immediately upon notification of such interference and shall inform the FCC in writing immediately of such an event and
- 5) Intelsat must operate the INTELSAT 702 satellite consistent with the Administration of India's coordination agreements and in compliance with all existing coordination agreements at the nominal 55.0° E.L. orbital location; and

---

<sup>1</sup> See SAT-STA-20031112-00326, stamp grant issued by Jennifer Gilsenan, Chief, Policy Branch, Satellite Division on November 13, 2003. (Intelsat was granted special temporary authority for a period of 30 days to begin drifting the INTELSAT 702 satellite to the 54.85° E.L orbital location in order to transfer traffic to the INSAT 3E satellite.)

<sup>2</sup> We note the Administration of India holds the C-band and Ku-band satellite network filings at the International Telecommunications Union for the operational satellite at the 55.0° E.L. orbital location. Previously, Intelsat through an agreement with the Administration of India and the Indian Space Research Organization ("ISRO") and under a grant of special temporary authority had been operating the INTELSAT 702 satellite at the 55.0° E.L. orbital location. (See File. Number SAT-STA-2003011000001 stamp grant issued by Jennifer Gilsenan, Chief, Policy Branch, Satellite Division on February 24, 2003).

- 6) Intelsat must operate in accordance with the terms of the Intelsat/New Skies agreement; and
- 7) Grant of this special temporary authority does not, in any way, prejudice Commission action on any pending or future Intelsat LLC application or amendment application for permanent or temporary authority, or for modification of permanent or temporary authority, to operate any satellite at the 54.85° E.L. orbital location; and
- 8) Intelsat is afforded thirty days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned; and
- 9) This Grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

2. Contact

<b>Name:</b>	Jennifer Hindin	<b>Phone Number:</b>	202-719-4975
<b>Company:</b>	Wiley Rein & Fielding LLP	<b>Fax Number:</b>	202-719-7049
<b>Street:</b>	1776 K Street, N.W.	<b>E-Mail:</b>	jhindin@wrf.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20006 -
<b>Contact Title:</b>	Attorney	<b>Relationship:</b>	Legal Counsel

(If your application is related to an application filed with the Commission, enter the file number below.)

3. Reference File Number SATAMD2003111800331

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification    CRY - Space Station (Geostationary)

5. Type Request

- Change Station Location                       Extend Expiration Date                       Other

6. Temporary Orbit Location  
54.85 degrees E.L.

7. Requested Extended Expiration Date  
2004-01-12 00:00:00.0

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat LLC ('Intelsat') herein requests a 30-day extension -- until January 12, 2004 -- of the Special Temporary Authority ('STA') originally granted beginning November 13, 2003 to immediately begin drifting INTELSAT 702 to 54.85

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of 'party to the application' for these purposes.  Yes  No

10. Name of Person Signing  
Patrick J. Cerra

11. Title of Person Signing  
Vice President

12. Please supply any need attachments.

Attachment 1: A

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**



Wiley Rein & Fielding LLP

1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

Virginia Office  
7925 JONES BRANCH DRIVE  
SUITE 6200  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wrf.com

December 8, 2003

Jennifer D. Hindin  
202.719.4975  
jhindin@wrf.com

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

Re: Request to Extend Special Temporary Authority for INTELSAT 702  
Call Sign: S2388; File No.: SAT-STA-20031112-00326

Dear Ms. Dortch:

Intelsat LLC ("Intelsat") herein requests a 30-day extension -- until January 12, 2004 -- of the Special Temporary Authority ("STA")<sup>1</sup> originally granted beginning November 13, 2003 to immediately begin drifting INTELSAT 702 to 54.85° E.L. and to conduct traffic transfer from that location.<sup>2</sup> INTELSAT 702 currently is located at 54.85° E.L. As discussed below, however, traffic transfer has not yet begun.

As the Commission is aware, Intelsat had operated INTELSAT 702 at 55.0° E.L. on a temporary basis in order to ensure continuity of services formerly carried on INSAT-2DT pending the launch of INSAT-2DT's replacement, INSAT-3E. INSAT-3E was successfully launched on September 28, 2003. The Indian Space and Research Organization ("ISRO"), which operates the INSAT satellites, requested that Intelsat move INTELSAT 702 to 54.85° E.L. for satellite safety reasons in order to transfer traffic from INTELSAT 702 to INSAT-3E.<sup>3</sup> ISRO further informed Intelsat that INSAT-3E will operate at 55.0° E.L. following traffic

<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and a \$705.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Request for Special Temporary Authority for INTELSAT 702*; Call Sign: S2388; File No. SAT-STA-20031112-00326 (filed Nov. 12, 2003) (stamp grant from Jennifer Gilsenan, FCC, to Jennifer Hindin, Wiley, Rein & Fielding LLP, provided on Nov. 13, 2003, with conditions).

<sup>3</sup> ISRO previously had requested that Intelsat transfer traffic from the 55.0° E.L., location, and then drift INTELSAT 702 to 55.1° E.L. Because of the change in ISRO's plans, Intelsat withdrew its STA request filed Oct. 30, 2003 (SAT-STA-20031030-00318) seeking Commission approval to drift INTELSAT 702 to 55.1° E.L.

Wiley Rein & Fielding LLP

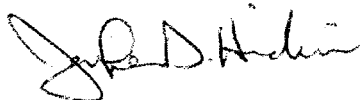
Ms. Marlene H. Dortch  
December 8, 2003  
Page 2

transfer. Based on the schedule most recently communicated by ISRO, Intelsat expected traffic transfer to begin on December 6 and be completed by early January. As of the date of this filing, ISRO has not yet begun traffic transfer.

Grant of this STA request will serve the public interest by ensuring the safety of INTELSAT 702 and INSAT-3E, while they are both nominally collocated at 55.0° E.L. In addition, grant of this STA request will not result in increased risk of harmful interference. At all times during INTELSAT 702's stay at 54.85° E.L., Intelsat will fully control the satellite. The carriage by INTELSAT 702 of INSAT-2DT's C-band traffic while at 54.85° E.L will be consistent with the Administration of India's coordination agreements for the nominal 55.0° E.L. location. In the unlikely event of harmful interference caused by INTELSAT 702's operations, Intelsat understands that it may be required by the FCC to turn off the offending transponders.

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

Sincerely,



Jennifer D. Hindin

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