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Federal Communications Commission  
Office of the Secretary

July 11, 2007



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

Re: Intelsat North America LLC Application for Special Temporary  
Authority Concerning the Intelsat 601 Satellite; Call Sign 2392  
File No. SAT-STA-20061102-00128

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”), pursuant to Section 1.65 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> herein supplements the above referenced request to move Intelsat 601 from 63.65° E.L. to 47.5° E.L., where the satellite will operate under an authorization from the German administration. As noted in the initial request,<sup>2</sup> Intelsat’s January 22, 2007 letter<sup>3</sup> responding to the FCC’s request for additional information,<sup>4</sup> Intelsat’s July 2, 2007 letter<sup>5</sup> and herein, grant of this request would serve the public interest.

As Intelsat stated in its January 22 letter, it elected to de-license Intelsat 601 for purposes of the satellite’s operation at 47.5° E.L. because operation as a German licensee – rather than as a U.S. licensee – better serves the interests of Intelsat’s customers, including (as stated in Intelsat’s July 2 letter) a U.S. Government customer that Intelsat expects will be interested in the satellite’s capacity once it is located at 47.5° E.L. In particular, the German authorization will provide Intelsat’s customers with greater certainty that their operations will not be interrupted. This, in turn, likely will result in more efficient utilization of

<sup>1</sup> 47 C.F.R. §1.65.

<sup>2</sup> *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20061102-00128 (filed Nov. 2, 2006) (“STA Request”); *See Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00415, File No. SAT-STA-20061102-00128 (Jan. 26, 2007) (Public Notice).

<sup>3</sup> Letter from Susan H. Crandall, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-STA-20061102-00128 (Jan. 22, 2007) (“January 22 Letter”).

<sup>4</sup> Letter from Robert G. Nelson, FCC, to Susan H. Crandall, Intelsat Corporation, File No. SAT-STA-20061102-00128 (Jan. 5, 2007).

<sup>5</sup> Letter from Susan H. Crandall, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-STA-20061102-00128 (July 2, 2007).

the satellite. The public interest is also better served when the licensing administration and the administration holding the ITU filing are one and the same. Any interference events are more efficiently addressed by the parties with ITU rights to the location; the United States would not have such rights with respect to 47.5° E.L. Nor would the United States have access to the relevant coordination agreements, because it would not have been a party to them.

The Commission has recognized that there is no public interest harm in de-licensing of U.S.-licensed satellites, having authorized such de-licensing on numerous occasions.<sup>6</sup> Nor is there any harm in allowing Germany to be the satellite's licensing administration. Germany has a transparent regulatory regime and will ensure that Intelsat 601's operations are in conformance with German and ITU regulations, as well as with applicable coordination agreements that Germany has entered into. Moreover, as Intelsat previously has stated, at the time Intelsat 601 is de-orbited, Intelsat will de-orbit it in accordance with the FCC's post-mission disposal rules.<sup>7</sup> Thus, the Commission need not be concerned that the United States has not fulfilled its obligations as the satellite's licensing administration.

Finally, no party opposed or commented on Intelsat's request to move Intelsat 601 to 47.5° E.L., or the fact that the satellite will operate under German authorization. This fact provides further evidence that no public interest harm will result in grant of this STA request.

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<sup>6</sup> See, e.g., *SES Americom, Inc.; Application for Modification of the AMC-16 Fixed-Satellite Service Space Station to Temporarily Vacate the 85° W.L. Orbital Location and for Telemetry, Tracking and Control Operations during Drift of the AMC-16 to and from the 118.75° W.L. Orbital Location*, Order and Authorization, 21 FCC Rcd 3430 (2006) (approving Canadian licensing of AMC-16 Ku-band payload) (extension grant issued by the Commission on Dec. 22, 2006 (21 FCC Rcd 14,785)); *EchoStar Satellite LLC; Application for Special Temporary Authority to Conduct Telemetry, Tracking, and Command Operations during the Relocation of EchoStar 4 To the 77° W.L. Orbital Location*, Order and Authorization, 21 FCC Rcd 4077 (Int'l Bur. Sat. Div. 2006) (approving Mexican licensing of EchoStar 4); *Policy Branch Information; Actions Taken*, Public Notice, 21 FCC Rcd 661 (2006) (approving Canadian licensing of DTV2); *Applications of DIRECTV Enterprises LLC: Request for Special Temporary Authority to Conduct Telemetry, Tracking and Control During the Relocation of DIRECTV 1 to the 72.5° W.L. Orbital Location*, Order and Authorization, 20 FCC Rcd 11,772 (Int'l Bur. Sat. Div. 2005) (approving Canadian licensing of DTV 1); *EchoStar Satellite LLC; Request For Special Temporary Authority for the EchoStar 5 Satellite*, Order and Authorization, 20 FCC Rcd 11,755 (Int'l Bur. Sat. Div. 2005) (approving Canadian licensing of EchoStar 5); *Application of DIRECTV, Inc.; Request For Special Temporary Authority for the DIRECTV 3 Satellite*, Order, 19 FCC Rcd 11,055, 11,061 (¶ 19) (Int'l Bur. Sat. Div. 2004) (approving Canadian licensing of DTV3); *Request for Special Temporary Authority for the Galaxy III-R Satellite*, File No. SAT-STA-20030324-00039 (approving Canadian licensing of Galaxy III-R).

<sup>7</sup> See January 22 Letter at 3-4.

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Because, as Intelsat has explained, allowing Intelsat 601 to operate at 47.5° E.L. pursuant to German authorization serves the public interest, and given that no public interest harm would result from such operation, Intelsat respectfully requests that the Commission grant this request so that Intelsat may satisfy the capacity demands of its customers.

Respectfully submitted,

*/s/ Susan H. Crandall*

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cc : Helen Domenici  
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