

Date & Time Filed: Oct 21 2008 5:23:14:346PM
File Number: SAT-STA-20081021-00207
Callsign: **K535**

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for STA to De-Orbit the Marisat F2 Satellite, Call Sign K535

1. Applicant

Name:	Intelsat North America LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall		



File # **SAT-STA-20081021-00207**

Call Sign **K535** Grant Date **10/24/08**
(or other identifier)

Term Dates
From **10/24/08** To: **+ 30 days**

Approved: *[Signature]*

w/conditions

SAT-STA-20081021-00207

Call Sign: KS35

October 29, 2008

Intelsat North America LLC's (Intelsat's) request for special temporary authority, IBFS File No. SAT-STA-20081021-00207, IS GRANTED. Accordingly, Intelsat is authorized for a period of 30 days commencing on October 29, 2008 to continue operating the tracking, telemetry, and command ("TT&C") payload on its MARISAT-F2 satellite to perform end of life maneuvers boosting the satellite to a disposal orbit above the geostationary arc in accordance with the terms, conditions, and technical specifications set forth in its application, the Commission's Rules and this Attachment.

1. Intelsat shall coordinate all orbit raising maneuver TT&C operations with existing geostationary satellites to ensure that no unacceptable interference results from its TT&C operations during its disposal operations.
2. During the disposal operations, no harmful interference shall be caused by MARISAT-F2 to any other lawfully operating space station or radio communications system and operations of the MARISAT-F2 satellite shall cease immediately upon notification of such interference.
3. Intelsat is required to accept interference from other lawfully operating space stations or radio communications systems.
4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
5. Within thirty days of completion of the end of life maneuvers, Intelsat shall send a letter to the Chief, Satellite Division, International Bureau indicating the apogee and perigee of MARISAT-F2's disposal orbit.
6. 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.
7. This action is used 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.



File # SAT-STA-20081021-00207

Call Sign _____ Grant Date 10/29/08
(or other identifier)

Term Dates
From 10/29/08 To: + 30 days

Approved: [Signature]

2. Contact	
Name:	Susan H. Crandall
Company:	c/o Intelsat Corporation
Street:	3400 International Drive, N.W.
City:	Washington
Country:	USA
Attention:	Susan H. Crandall
Phone Number:	202-944-7848
Fax Number:	202-944-7870
E-Mail:	susan.crandall@intelsat.com
State:	DC
Zipcode:	20008 -3006
Relationship:	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CRY - Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location	<input type="radio"/> Extend Expiration Date
	<input checked="" type="radio"/> Other
6. Temporary Orbit Location	
	7. Requested Extended Expiration Date

<p>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.)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat North America LLC herein requests STA, beginning on 10/29/2008 and lasting for a period of 30 days, in order to de-orbit the MARISAT-F2 satellite from its current location at 33.9 W.L. and to perform TT&C functions with MARISAT-F2 during this maneuver.</p> </div>					
<p>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.</p> <p style="text-align: center;"> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>					
<p>10. Name of Person Signing Susan H. Crandall</p>	<p>11. Title of Person Signing Asst. General Counsel, Intelsat Corporation</p>				
<p>12. Please supply any need attachments.</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Attachment 1: STA Request</td> <td style="width: 50%;">Attachment 2:</td> </tr> <tr> <td></td> <td>Attachment 3:</td> </tr> </table>		Attachment 1: STA Request	Attachment 2:		Attachment 3:
Attachment 1: STA Request	Attachment 2:				
	Attachment 3:				
<p style="text-align: center;">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).</p>					

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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.

October 21, 2008

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



Re: Request for Special Temporary Authority to De-Orbit the Marisat-F2
Satellite, Call Sign KS35

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat"), pursuant to Section 25.120 of the rules of the Federal Communications Commission ("FCC" or "Commission"),¹ herein requests Special Temporary Authority ("STA"), beginning on October 29, 2008 and lasting for a period of thirty days, in order to de-orbit the MARISAT-F2 satellite (Call Sign KS35) from its current location at 33.9° W.L. and to perform telemetry, tracking and command ("TT&C") functions with MARISAT-F2 during this maneuver.²

Grant of this STA is in the public interest. The MARISAT-F2 satellite was launched in October 1976 and is nearing the end of its extraordinarily long useful life. Recently, the telecommand link to that spacecraft has begun to deteriorate. Accordingly, Intelsat seeks to commence de-orbiting by the end of this month, which is earlier than previously anticipated.

Intelsat intends to de-orbit the MARISAT-F2 satellite to a perigee 200 km above synchronous altitude.³ This perigee was selected based on Intelsat's propellant accounting and recent experience with MARISAT-F2's maneuver performance. As a satellite launched prior to March 18, 2002, the minimum

¹ 47 C.F.R. § 25.120.

² This request for special temporary authority is filed out of an abundance of caution. The plain language of Section 25.283(b) appears to provide inherent authority for satellites launched prior to March 18, 2002—and thus not required under Section 25.183(d) to meet minimum perigee requirements set forth in Section 25.283(a)—to operate TT&C frequencies for the purpose of de-orbiting (provided only that control operations are coordinated with potentially affected operators).

³ This height is well above the 150 km suggested by the Commission as an acceptable height for satellites launched prior to March 18, 2002. See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567, ¶ 82 (2004).

Ms. Marlene H. Dortch
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perigee requirements for decommissioning set forth in Section 25.283(a) of the Commission's rules do not apply to MARISAT-F2.⁴

The de-orbit of MARISAT-F2 will not cause any significant risk of harmful interference to other satellites. During the relocation of MARISAT-F2, the satellite's communications payload will remain inactive and only the TT&C payload will operate. Intelsat requests authority to operate the following TT&C frequencies: 3945.5 MHz (telemetry downlink frequency) and 6175.0 MHz (command uplink frequency). These frequencies will be coordinated and will operate on a non-interference basis.⁵

Finally, consistent with Section 25.283(c), upon completion of de-orbit maneuvers, all stored energy sources will be discharged by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request for special temporary authority to de-orbit the MARISAT-F2 satellite.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

⁴ 47 C.F.R. § 25.283(d).

⁵ See 47 C.F.R. § 25.283(b).