

December 16, 2009

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



Re: Request for Special Temporary Authority for Intelsat 801
Call Sign: S2391

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 60 days beginning February 15, 2010 to drift Intelsat 801 from 31.5° W.L. to 29.5° W.L. and operate temporarily at the 29.5° W.L. location.² Intelsat plans shortly to file an application to modify the license for Intelsat 801 to allow its permanent operation at that location, where it will be co-located with Intelsat 705.³

Intelsat expects to have Intelsat 801 at 29.5° W.L. mid - to late March 2010. During the drift, Intelsat will continue operating the satellite's C-band communications frequencies, as well as the satellite's TT&C frequencies. The operation of the satellite's C-band communications frequencies during the drift is being done to ensure continuity of service to C-band customers on the satellite -- including a U.S. Government customer -- that cannot be accommodated on another Intelsat satellite until a later date.⁴ Intelsat confirms that there are no satellites between 31.5° W.L. and 29.5° W.L. that operate a C-band communications payload. The specific C-band communications frequencies that will be operating during the drift are as follows:

Uplink:

3625-4200 MHz

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² Intelsat 801 cannot remain at the nominal 31.5° W.L. location and possibly transfer its traffic to Intelsat 25, which will operate at 31.5° W.L. subject to receipt of FCC approval, because Intelsat 25 is a linearly polarized satellite, while Intelsat 801 is circularly polarized.

³ Subject to receipt of FCC approval, Intelsat 705 will be relocated from 50.0° W.L. to 29.5° W.L. starting mid-February 2010.

⁴ Intelsat 705 will be at full capacity with 2010 World Cup-related transmissions until the sporting event has concluded.

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Downlink:

5850-6425 MHz

Intelsat will follow industry practices in coordinating the TT&C transmissions that will be used during the drift. The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP) and 6176.3 MHz (RHCP)

Downlink:

3947.5 MHz (RHCP), 3948.0 MHz (RHCP), 3952.0 MHz (RHCP), and 3952.5 MHz (RHCP)

Once at 29.5° W.L., Intelsat will operate the satellite's Ku-band payload as well. Specifically, those frequencies are as follows:

Uplink:

14.0-14.5 GHz

Downlink:

10.95-11.2 GHz; 11.45-11.95 GHz and 12.5-12.75 GHz.⁵

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service to C-band customers on Intelsat 801, with no service outage while the satellite drifts. Customers will not experience service degradation because they will be tracking the satellite during the drift.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, there are no satellites in the drift path utilizing C-band communications frequencies and thus, no interference issues are foreseen. In any case, should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. At the 29.5° W.L.

⁵ The 12.5-12.75 GHz frequencies will be used only in ITU Region 1.

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location, Intelsat will operate the satellite's C- and Ku-band communications and TT&C frequencies in conformance with its coordination agreements applicable to operation at this location.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Except for Intelsat 705, Intelsat 801 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁶ Further, except for Intelsat 705, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 801 at 29.5° W.L. Finally, Intelsat is not aware of any satellite network with an overlapping station-keeping volume with Intelsat 801 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

⁶ Intelsat will operate both satellites in the 29.5° +/- 0.05° station-keeping box. Both satellites operate in inclined orbit.