

December 22, 2009

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



Re: Request for Special Temporary Authority to Continue Operating the
Intelsat 706 Payload, Call Sign S2401

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")² for 180 days beginning February 4, 2010 for Intelsat to continue operating the Intelsat 706 satellite's payload (Call Sign S2401) at its current location of 54.85° E.L.³ Intelsat 706 will continue to operate at that location in accordance with the ITU filings of the Indian Administration.⁴

¹ 47 C.F.R. § 25.120.

² Intelsat has filed its STA request, an FCC Form 159, an \$830.00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00632, File No. SAT-STA-20090807-00082 (Sept. 11, 2009) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00638, SAT-STA-20090929-00100 (Oct. 9, 2009); *Policy Branch Information; Actions Taken*, Report No. SAT-00644, File No. SAT-STA-20090923-00099 (Nov. 6, 2009); *Policy Branch Information; Actions Taken*, Report No. SAT-00652, File No. SAT-STA-20091201-00134 (Dec. 4, 2009). Intelsat is concurrently with this request filing a request for a 30-day extension of the most recent STA extension. Intelsat plans to relocate Intelsat 706 in June 2010. Intelsat is therefore filing this 180-day STA request to cover the remaining time period that the satellite is expected to remain at 54.85° E.L., accounting for possible delay. Intelsat has authority to operate the satellite's TT&C carriers at 54.85° E.L. through the requested STA period. See *Intelsat North America LLC, Application to Modify Authorization for Intelsat 706*, File No. SAT-MOD-20081124-00218, condition #20 (stamp grant issued Mar. 20, 2009 by Stephen J. Dual).

⁴ A copy of the extension of Intelsat's agreement with the Indian Administration through December 31, 2010 was attached to the most recent STA request and is incorporated herein by reference.

Ms. Marlene H. Dortch
December 22, 2009
Page 2

Grant of this STA request is in the public interest because it will ensure continuity of service to Intelsat's customers in the Indian Ocean Region. During this temporary period, Intelsat agrees to comply with the existing conditions of its authorization to operate Intelsat 706 at 54.85° E.L. Moreover, grant of this temporary request will not result in increased risk of harmful interference because Intelsat 706's operations at 54.85° E.L. are already on a non-harmful interference basis. Intelsat will also continue to operate in accordance with India's existing coordination agreements regarding the nominal 55° E.L. location.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request for a 180-day STA to continue to operate the Intelsat 706 satellite at 54.85° E.L. until the satellite's planned relocation in June 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Stephen Duall
Kathryn Medley
Jay Whaley