

December 30, 2009

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



Re: Request for Extension of Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 15; Call Sign: S2789

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a seven-day extension – through January 12, 2010 – of the Special Temporary Authority ("STA")¹ previously granted Intelsat to conduct in-orbit testing ("IOT") of Intelsat 15 (call sign S2789) at 63.15° E.L. in the bands 13750-14500 MHz (uplink) and 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz (downlink) and to drift the satellite to its permanent location of 85.15° E.L.² Intelsat 15 has completed IOT and currently is drifting to 85.15° E.L. It is expected to arrive on station on January 12, 2010. In support of its request, Intelsat submits the following information.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. Except for Intelsat 709, Intelsat 15 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.³ Further, except for Intelsat 709, 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 15. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 15 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 15 at 63.15° E.L. was a critical step in ensuring that the satellite will be fully operational at 85.15° E.L. Grant of this STA

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

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00652, File No. SAT-STA-20091014-00110 (Dec. 4, 2009) (Public Notice).

³ Following traffic transfer, and subject to receipt of FCC approval, Intelsat 709 will be relocated to 54.85° E.L. See *Application of Intelsat North America to Modify the License of Intelsat 709*, File No. SAT-MOD-20091106-00117 (filed Nov. 6, 2009).

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extension request will allow the satellite to continue drifting to 85.15° E.L. and thereby ensure continuity of service at the nominal 85.0° E.L. location. Grant is therefore in the public interest.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall