

January 11, 2010

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



Re: Request for Special Temporary Authority to Drift Intelsat 709
Call Sign S2396

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 709 (call sign S2396) from 85.15° E.L. to 54.85° E.L. and begin operating at 54.85° E.L. Intelsat has a pending application for permanent authority to redeploy Intelsat 709 to 54.85° E.L., where it will operate in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.² In that application, Intelsat indicated it expected to begin drifting in early April and begin service shortly thereafter. In order to satisfy customer demand, Intelsat has decided to begin the drift of Intelsat 709 earlier – as early as February 15 – and thus seeks STA to drift the satellite and begin operating pending action on the application for permanent authority.

Intelsat 709 is currently licensed to operate at 85.15° E.L.³ Following traffic transfer from Intelsat 709 to Intelsat 15, Intelsat 709 will be relocated to 54.85° E.L. where it will replace Intelsat 706, which currently operates at that location

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

² See *Application of Intelsat North America to Modify License for Intelsat 709*, File No. SAT-MOD-20091106-00117 (filed Nov. 6, 2009); *Application of Intelsat North America LLC to Amend Application*, File No. SAT-AMD-20100104-00003 (filed Jan. 4, 2010).

³ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, at Appendix A, Table 1 (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration); *Intelsat North America LLC; Application to Modify License for the INTELSAT 709 Satellite to Include Fixed-Satellite Serv. in the 11.7-11.95 GHz Frequency Band*, Order, 22 FCC Rcd 11,989 (2007).

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pursuant to the ITU filings of the Indian Administration.⁴ Subject to receipt of FCC approval, Intelsat expects to begin operating Intelsat 709 at 54.85° E.L. at the beginning of April 2010.

During the drift of Intelsat 709 from 85.15° E.L. to 54.85° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

Downlink:

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

Grant of this STA request is in the public interest because it will allow Intelsat – in response to customer demand -- to begin drifting Intelsat 709 and operating the satellite at 54.85° E.L. earlier than originally planned. In addition, grant will ensure continuity of service to customers in the Indian Ocean region.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 54.85° E.L., Intelsat will operate the communications payload in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also agrees to

⁴ Intelsat's recent extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. through December 31, 2010. That extension was attached to a previously-filed STA request (*see* File No. SAT-STA-20091201-00134) and is incorporated herein by reference.

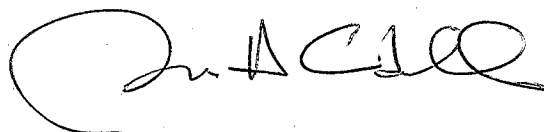
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operate Intelsat 709 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 706 at this same orbital location.⁵

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 706, Intelsat 709 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, 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 709. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 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 expeditiously grant this request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall

⁵ See IBFS File No. SAT-MOD-20081124-00218 (grant stamp, dated Mar. 20, 2009).

⁶ Intelsat will file a future application for authority to relocate the Intelsat 706 satellite.