

January 11, 2010

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



Re: Request for Special Temporary Authority to Conduct In-Orbit Testing
of Intelsat 16; Call Sign: S2750

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from February 21, 2010 through March 22, 2010, to conduct in-orbit testing ("IOT") of Intelsat 16 (call sign S2750) at 48.0° W.L. in the bands 13750-14500 MHz and 12750-13250 MHz in the uplink and 11700-12200 MHz and 10700-11450 MHz in the downlink and to drift the satellite to its permanent location of 58.1° W.L.² Intelsat 16 currently is scheduled to be launched on February 11, 2010, and will be nominally co-located with Intelsat 9 (call sign S2380), which currently operates at 58.0° W.L. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 16, Intelsat will operate in the above referenced Ku-bands. Intelsat has coordinated the planned in-orbit testing of Intelsat 16 with all operators of satellites operating co-frequency up to six degrees away from 48.0° W.L. Specifically, Intelsat has internally coordinated the proposed testing with the following of its satellites: Intelsat 705 (call sign S2395) at 50.0° W.L., Intelsat 707 (call sign S2398) at 53.0° W.L., Intelsat 1R (call sign S2368) at 50.0° W.L., Intelsat 14 (call sign S2785) at 45.0° W.L., Intelsat 3R (call sign PAS-2R) at 43.1° W.L., and Intelsat 11 (call sign S2237) at 43.0° W.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 during in-orbit testing at 48.0° W.L. Intelsat 16 will not be

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice). During the drift from 48.0° W.L. to 58.1° W.L., only the satellite's TT&C frequencies will be utilized.

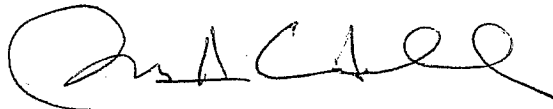
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located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 16. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 16 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 16 at 48.0° W.L. is a critical step in ensuring that the satellite will be fully operational at 58.1° W.L. This, in turn, will provide additional capacity at the nominal 58.0° W.L. location, and thereby promotes the public interest.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall