

February 5, 2010

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



Re: Request for Special Temporary Authority for Intelsat 705 to Drift to  
and Operate at 330.5° E.L. (29.5° W.L.)  
Call Sign: S2395

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 60 days—from March 1, 2010 through April 30, 2010—to drift the Intelsat 705 satellite (call sign S2395) from 310.0° E.L. (50° W.L.)<sup>2</sup> to 330.5° E.L. (29.5° W.L.) and then operate the satellite at the 330.5° E.L. (29.5° W.L.) location. Intelsat has a pending application to modify the Intelsat 705 license to allow it to relocate the satellite to, and operate at, 330.5° E.L. (29.5° W.L.),<sup>3</sup> where it will be co-located with Intelsat 801.<sup>4</sup>

Intelsat expects to have Intelsat 705 at 330.5° E.L. (29.5° W.L.) within 10 weeks of beginning the drift. During the drift, Intelsat will utilize only Intelsat 705’s TT&C frequencies and will follow industry practices for coordinating

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

<sup>2</sup> The Intelsat 1R satellite (call sign S2368) has special temporary authorization to operate at 50° W.L. until March 18, 2010. *Policy Branch Information; Actions Taken*, Report No. SAT-00660, DA 10-89, File No. SAT-STA-20100111-00005 (released Jan. 15, 2010; effective Jan. 14, 2010). PanAmSat Licensee Corp. also has a pending application for operation of the Intelsat 1R satellite at 50° W.L. *PanAmSat Licensee Corp.*, Application to Modify Authorization for Intelsat 1R (S2368), File No. SAT-MOD-20090720-00073 (filed July 20, 2009).

<sup>3</sup> *Intelsat North America LLC, Application to Modify Authorization for Intelsat 705*, File No. SAT-MOD-20100115-00010 (filed Jan. 15, 2010). This pending modification application noted that the drift of Intelsat 705 to 330.5° E.L. (29.5° W.L.) was planned for February 15, 2010. The start of the drift has been delayed until March 1, 2010.

<sup>4</sup> See *Intelsat North America LLC, Request for Special Temporary Authority for Intelsat 801*, File No. SAT-STA-20091216-00146 (filed Dec. 16, 2009) (seeking Special Temporary Authority to operate the Intelsat 801 satellite at 29.5° W.L. beginning in February 2010).

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 enable Intelsat to provide robust service to customers. In particular, the Intelsat 705 satellite will be used at the 330.5° E.L. (29.5° W.L.) orbital location to provide 2010 World Cup-related transmissions in June and July 2010. These World Cup-related transmissions cannot be accommodated on Intelsat 801 at the same location because Intelsat 801 is too highly inclined to support such transmissions.

Grant of the STA also will serve the public interest by affording the Commission additional time to complete its review of Intelsat's pending modification application to relocate Intelsat 705 to, and operate at, 330.5° E.L. (29.5° W.L.). Because the pending modification application has not yet been placed on Public Notice, it may not be granted in time to provide service to customers for the World Cup. Intelsat understands and accepts that a grant of STA would not prejudice the Commission's determination of Intelsat's request to operate Intelsat 705 at 330.5° E.L. (29.5° W.L.) on a permanent basis, and operation of the satellite at that location pursuant to STA is at Intelsat's risk.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only 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. At the 330.5° E.L. (29.5° W.L.) location, Intelsat will operate the satellite's communications payload in conformance with its coordination agreements covering the location.

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 801, Intelsat 705 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.<sup>5</sup> Further, except for Intelsat 801, 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 705 at 330.5° E.L. (29.5° W.L.). Finally, Intelsat is not aware of any satellite network with an overlapping station-keeping volume with Intelsat 705 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,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall

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<sup>5</sup> Intelsat will operate both satellites in the 29.5° +/- 0.05° station-keeping box. Both satellites operate in inclined orbit, which facilitates sharing of the station-keeping box.