

March 12, 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 25  
Call Sign: S2804

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 14 days—from March 15, 2010 through March 29, 2010—to conduct in-orbit testing (“IOT”) of and to perform telemetry, tracking and command (“TT&C”) for the Intelsat 25 satellite (call sign S2804) at the 31.5° W.L. orbital location. Intelsat has a pending application for authority to operate the Intelsat 25 satellite at 31.5° W.L.<sup>2</sup> Intelsat 25 is currently drifting to 31.5° W.L. under authorization from the administration of Papua New Guinea using earth stations located outside the United States. The satellite is scheduled to arrive at 31.5° W.L. on March 15, 2010.

Intelsat will conduct IOT pursuant to this STA only in the following conventional C-band frequencies:<sup>3</sup>

3700–4200 MHz  
5925–6425 MHz

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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> *Intelsat North America LLC, Application for Authority to Operate Intelsat 25, an In-orbit Satellite, at 31.5° W.L.*, File No. SAT-A/O-20091223-00151 (filed Dec. 23, 2009) (“*Intelsat 25 Application*”).

<sup>3</sup> Intelsat will use its U.S. licensed earth station, call sign KA275, located in Clarksburg, Maryland to conduct this testing. Intelsat is separately filing a request for special temporary authority to add the Intelsat 25 satellite as a temporary point of communication for this earth station.

Intelsat will conduct TT&C pursuant to this STA using a non-U.S. earth station in the following C-band frequencies:

6419.0 (V) uplink  
5850.5 (H) uplink  
4198.5 (H) downlink  
3630.0 (V)<sup>4</sup> downlink

Grant of the STA will serve the public interest. Grant will allow Intelsat to begin partial in-orbit testing immediately upon the arrival of Intelsat 25 at its proposed permanent operating location of 31.5° W.L. Intelsat 25 is a newly acquired in-orbit satellite. Testing is a critical step in ensuring that the satellite will be fully operational at 31.5° W.L. This, in turn, will provide customers with the benefits of additional capacity at the 31.5° W.L. location as quickly as possible.

Grant will also provide the Commission additional time to complete its review of Intelsat's pending application for permanent authority to operate the Intelsat 25 satellite at the 31.5° W.L. orbital location. In particular, grant of this STA will provide needed time for completion of inter-agency coordination of the extended band frequencies. Intelsat understands and accepts that a grant of this STA would not prejudice the Commission's determination of Intelsat's request to operate Intelsat 25 at 31.5° W.L. on a permanent basis, and that testing and TT&C operation pursuant to this STA is at Intelsat's risk.

Grant of this STA request will not result in an increased risk of harmful interference. Intelsat operates (or shortly will operate) the satellites using C-band frequencies that are immediately adjacent to 31.5° W.L. at the 29.5° W.L. orbital location<sup>5</sup> and at the 34.5° W.L. orbital location<sup>6</sup> and thus can internally monitor and coordinate any interference to adjacent satellites.

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

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<sup>4</sup> Section 25.202(g) requires telemetry, tracking and telecommand functions to be "conducted at either or both edges of the allocated band(s)." 47 C.F.R. § 25.202(g). In the pending application for permanent authority to operate at the 31.5° W.L. orbital location, Intelsat seeks waiver of Section 25.202(g) for the proposed use of use of 3630 MHz for telemetry. *See* Intelsat 25 Application at 5-6. To the extent necessary, Intelsat seeks waiver of Section 25.202(g) for operations conducted pursuant to STA.

<sup>5</sup> *Application for Special Temporary Authority to Drift the Intelsat 801 Satellite to 29.5° W.L.*, File No. SAT-STA-20091216-00146 (stamp grant Feb. 22, 2010).

<sup>6</sup> *Application of Intelsat LLC to Modify Authorizations*, File No. SAT-MOD-20011221-00139 (stamp grant Mar. 22, 2002) (granting Intelsat authority to operate the Intelsat 903 satellite at 34.5° W.L.).

space stations. 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 25 at the 31.5° W.L. location. Finally, Intelsat is not aware of any satellite network with an overlapping station-keeping volume with Intelsat 25 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,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall