

File # SAT- STA-20100312-00045

Call Sign S2804 Grant Date 03/15/10

(or other identifier)

Term Dates From 03/15/10 To: 03/29/10

Approved by OMB 3060-0678

Date & Time Filed: Mar 12 2010 3:59:52:900PM
File Number: SAT-STA-20100312-00045
Callsign:



GRANTED*

International Bureau

*subject to conditions

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for STA to Conduct IOT and Perform TT&C for Intelsat 25 (Call Sign S2804) at 31.5 W.L.

1. Applicant

Name:	Intelsat North America LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Attachment to Grant
IBFS File No. SAT-STA-20100312-00045
Call Sign S2804

The request of Intelsat North America LLC (Intelsat) for special temporary authority (STA), IBFS File No. SAT-STA-20100312-00045, IS GRANTED. Accordingly, Intelsat is authorized to conduct in-orbit testing of the Intelsat 25 space station (Call Sign S2804) at the 31.5° W.L. orbital location using the 3700-4200 MHz (Earth-to-space) and 5925-6425 MHz (space-to-Earth) frequency bands for a period of 14 days, commencing on March 15, 2010. Intelsat is also authorized to conduct telemetry, tracking, and telecommand (TT&C) operations via an earth station located outside the United States using the following frequencies: 6419.0 (Earth-to-space), 5850.5 (Earth-to-space), 4198.5 (space-to-Earth), and 3630.0 (space-to-Earth). This authorization is granted in accordance with the terms, conditions, and technical specifications set forth in Intelsat's application, the Commission's rules, and the conditions set forth below.

1. All operations shall be on unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station.
2. In the event of any harmful interference as a result of the operations of the Intelsat 25 space station during in-orbit testing at the 31.5° W.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
3. Intelsat shall maintain Intelsat 25 within an east/west longitudinal station-keeping tolerance of ± 0.05 degrees of the 31.5° W.L. orbital location.
4. Operations of the Intelsat 25 space station at the 31.5° W.L. orbital location are limited to in-orbit testing and shall not include any provision of commercial services.
5. Any action taken or expense incurred as a result of operations pursuant to this STA is at Intelsat's own risk.
6. Grant of this authorization is without prejudice to any determination that the Commission may make regarding permanent operations of the Intelsat 25 space station at the 31.5° W.L. orbital location. See IBFS File No. SAT-A/O-20091223-00151.
7. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.



*subject to conditions

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From 03/15/10 To: 03/29/10
Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact	
Name: Jennifer D. Hindin	Phone Number: 202-719-4975
Company: Wiley Rein LLP	Fax Number: 202-719-7049
Street: 1776 K Street, NW	E-Mail: jhindin@wileyrein.com
City: Washington	State: DC
Country: USA	Zipcode: 20006
Attention:	Relationship: Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CRY - Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input checked="" type="radio"/> Other	
6. Temporary Orbit Location	
7. Requested Extended Expiration Date	

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat North America LLC herein requests Special Temporary Authority for fourteen days -- from March 15, 2010 through March 29, 2010 -- to conduct in-orbit testing of and to perform telemetry, tracking and command for the Intelsat 25 satellite (call sign S2804) at the 31.5 W.L. orbital location.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.

Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. Gen. Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

March 12, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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")¹ 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.² 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:³

3700–4200 MHz
5925–6425 MHz

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 *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*").

³ 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)⁴ 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 location⁵ and at the 34.5° W.L. orbital location⁶ 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

⁴ 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.

⁵ *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).

⁶ *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