

March 15, 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 30 days beginning April 2, 2010 to continue to drift Intelsat 709 (call sign S2396) past 54.85° E.L. to 50.0° E.L. and to operate it at 50.0° E.L. for 10 days pursuant to the ITU filings of the administration of Turkey before drifting the satellite back to 54.85° E.L.² Intelsat has a grant of STA to drift Intelsat 709 to 54.85° E.L. and to operate temporarily at that location in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.³ Intelsat also has a pending application for permanent authority to redeploy Intelsat 709 to 54.85° E.L., where it will operate pursuant to the filings of the Indian Administration.⁴ Intelsat 709 currently is drifting toward 54.85° E.L. It is expected to reach that location on or about April 4, 2010. So as not to have to stop the satellite at 54.85° E.L. before continuing on to 50.0° E.L., Intelsat is requesting that the STA to continue on to 50.0° E.L. be granted by April 2, 2010.

Subject to receipt of FCC approval, Intelsat expects to begin operating Intelsat 709 at 50.0° E.L. on April 11, 2010. As noted above, the satellite will operate at that location for 10 days before heading back to 54.85° E.L.

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 Intelsat will shortly file under a request for confidential treatment its agreement with Turksat, the authorized operator for 50.0° E.L., allowing Intelsat 709 to operate at that location.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00666, File No. SAT-STA-20100111-00006 (Feb. 19, 2010) (Public Notice).

⁴ 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).

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During the drift of Intelsat 709 to 50.0° E.L., as well as from 50.0° E.L. back 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)

At 50.0° E.L., Intelsat 709 also will operate in the following bands: 3700-4200 MHz, 5925-6425 MHz, 10950-11200 MHz, 11450-11700 MHz, 12500-12750 MHz and 14000-14500 MHz.

Grant of this STA request is in the public interest because it will allow Intelsat -- in response to a very recent customer demand -- to continue drifting Intelsat 709 past 54.85° E.L. and temporarily operate it at 50.0° E.L. The satellite will then drift back to 54.85° E.L. for permanent operation, as set forth in the pending application.

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 50.0° E.L., Intelsat will operate the communications payload in conformance with the administration of Turkey's coordination agreements related to the 50.0° E.L. location.

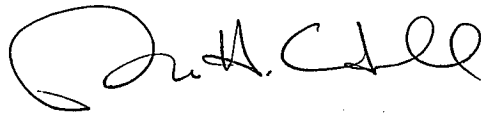
Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. At 50.0° E.L., Intelsat 709 will not be located at the same orbital location as another satellite or at an orbital location that has an

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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 709 at 50.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 at 50.0° E.L. 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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall