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File Number: SAT-STA-20100315-00046  
Callsign:

File # SAT-STA-20100315-00046

Call Sign S2396 Grant Date 03/30/10  
(or other identifier)

Term Dates period of  
From 03/02/10 To: 30 days

Approved:

*Susan H Crandall*

Stephen J. Duall  
Chief, Satellite Policy Branch

Approved by OMB  
3060-0678



FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for STA to Drift Intelsat 709 (Call Sign S2396)

I. Applicant

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

**Attachment to Grant**  
**IBFS File No. SAT-STA-20100315-00046**  
**Call Sign S2396**  
**March 30, 2010**

The request of Intelsat North America LLC (Intelsat) for special temporary authority, IBFS File No. SAT-STA-20100315-00046, is granted.<sup>1</sup> Accordingly, Intelsat is authorized, for a period of 30 days commencing on April 2, 2010, to conduct Telemetry, Tracking, and Command (TT&C) operations with the Intelsat 709 space station (Call Sign 2396) to effect the drift of the Intelsat 709 space station from the 58.45° E.L. orbital location to the 50.0° E.L. orbital location, and from the 50.0° E.L. orbital location to the 58.45° E.L. orbital location, using the following frequencies: 6173.7 MHz and 6176.3 MHz (left-hand circular polarization/Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (right-hand circular polarization/space-to-Earth). Additionally, Intelsat is authorized to operate the Intelsat 709 space station in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10950-11200 MHz (space-to-Earth), 11450-11700 MHz (space-to-Earth), 12500-12750 MHz (space-to-Earth), and 14000-14500 MHz (Earth-to-space) frequency bands to provide fixed-satellite service (FSS) from the 50.0° E.L. orbital location once it arrives at that location. This authorization shall be in accordance with the technical specifications set forth in Intelsat's application, Federal Communication Commission (Commission) rules, and the following conditions:

1. All operations during the drifts shall be on an 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 during Intelsat 709's drifts between the 54.85° E.L. orbital location and the 50.0° E.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
3. During the drifts between the 54.85° E.L. orbital location and the 50.0° E.L. orbital location, Intelsat may not operate Intelsat 709's communications payload.
4. Intelsat's operations at the 50.0° E.L. orbital location shall be on a 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 space station.
5. In the event of any harmful interference during Intelsat's operations at the 50.0° E.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.

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<sup>1</sup> Intelsat is currently operating Intelsat 709 under special temporary authority (IBFS Sat No. SAT-STA-20100111-00006) that allows Intelsat 709 to drift to and operate at the 54.85° E.L. orbital location for a period of 60 days, commencing on February 15, 2010. Under the terms of the instant special temporary authority, Intelsat 709 will be allowed to continue its drift past the 54.85° E.L. orbital location and to the 50.0° E.L. orbital location, operate at that location for a short period, and then drift Intelsat 709 back to the 54.85° E.L. orbital location. Intelsat has a pending application to modify the permanent authorization for Intelsat 709 in order to operate Intelsat 709 at the 54.85° E.L. orbital location on a long-term basis (IBFS File No. SAT-MOD-20091106-00117, as amended by SAT-AMD-20100104-00003).

**Attachment to Grant**  
**IBFS File No. SAT–STA–20100315–00046**  
**Call Sign S2396**  
**March 30, 2010**

6. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.

7. While at the 50.0° E.L. orbital location, Intelsat shall maintain the Intelsat 709 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.

8. Intelsat shall maintain full operational control of the Intelsat 709 space station at all times.

9. This authorization is issued on the understanding that Intelsat, pursuant to its agreement with Turksat Uydu Haberslesme ve Isletme A.S. (Turksat AS), will conform its operations to parameters agreed to in coordination agreements between the Administration of Turkey and other Administrations. As the United States remains the licensing authority, responsibility for both compliance with and enforcing compliance with those agreements is a matter which would arise under private law.

10. This authorization is also issued on the understanding that, with regard to filings with the International Telecommunication Union (ITU), the Administration of Turkey is not acting pursuant to Article 9.1 of the Radio Regulation on behalf of the United States.

11. This authorization is also issued on the understanding that the Federal Communications Commission remains the licensing administration, for purposes of ITU Radio Regulation 18.1, for the Intelsat 709 space station, and that its operations are pursuant to ITU Radio Regulation 4.4.

12. This authorization is issued on the understanding that this grant is not an approval of any specific agreement entered into by Intelsat, its subsidiaries, and affiliates, nor of any specific provision of any such agreement, concerning operation of the Intelsat 709 space station, nor is it an approval of an agreement concerning any related matter, nor of any specific provision of any such agreement concerning any related matter.

13. This authorization is issued on the understanding that this grant does not in any way express a view concerning, or agreement as to, the validity or lack of validity of any ITU filing at or within the vicinity of the 50.0° E.L. orbital location.

14. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

15. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.

16. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application to modify the authorization of the Intelsat 709 space station in order to re-locate it to the 54.85° E.L. orbital location (IBFS File No. SAT–MOD–20091106–00117, as amended by SAT–AMD–20100104–00003).

**Attachment to Grant**  
**IBFS File No. SAT-STA-20100315-00046**  
**Call Sign S2396**  
**March 30, 2010**

17. 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.



\*subject to conditions

File # SAT-STA-20100315-00046  
Call Sign S2396 Grant Date 03/30/10  
(or other identifier)  
Term Dates period of  
From 04/02/10 To: 30 days  
Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch



<b>2. Contact</b>	
<b>Name:</b>	Intelsat North America LLC
<b>Company:</b>	Intelsat North America LLC
<b>Street:</b>	c/o Intelsat Corporation
<b>City:</b>	3400 International Drive, N.W.
<b>Country:</b>	Washington
<b>Attention:</b>	USA
<b>Phone Number:</b>	202-944-7848
<b>Fax Number:</b>	202-944-7870
<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>State:</b>	DC
<b>Zipcode:</b>	20008 -3006
<b>Relationship:</b>	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 checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> Other	
7. Requested Extended Expiration Date	
6. Temporary Orbit Location	
50.0 E.L.	

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 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.

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. General 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**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**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 15, 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 to Drift Intelsat 709  
Call Sign S2396

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup> 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.

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

<sup>2</sup> 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.

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

<sup>4</sup> 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.

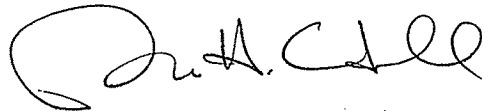
Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. At 50.0° E.L., Intelsat 709 will not be located at the same orbital location as another satellite or at an orbital location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

Ms. Marlene H. Dortch  
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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

March 26, 2010

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



Re: Supplemental Information  
Intelsat North America LLC Application for Special Temporary  
Authority for Intelsat 709 (Call sign S2396); File No. SAT-STA-  
20100315-00046

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") hereby provides the following supplemental information in response to a request by the International Bureau's staff for additional information relating to Intelsat's above referenced request for Special Temporary Authority 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. Specifically, Intelsat attaches hereto a letter from Türksat Satellite Communication Cable TV and Operation Inc. ("Türksat") confirming that Türksat has informed the Government of Turkey that Intelsat 709 will operate at 50.0° E.L. under United States licensing authority.

Please direct any questions about this supplement to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Attachment

cc: Robert Nelson (with attachment)  
Karl Kensinger (with attachment)  
Kathryn Medley (with attachment)  
Stephen Duall (with attachment)



Mr. Edward Berger  
Director, Business Development  
Intelsat Corporation  
3400 International Drive NW  
Washington, DC 20008

25 March, 2010

Dear Mr. Berger,

Türksat Satellite Communication Cable TV and Operation Inc. – whose all shares belong to Undersecretaries of Treasury of the Government of Turkey and has been established by Additional Article 33 of Law No. 406 on Telegraph and Telephone, for the purposes of possessing the rights, management and operating authority of the satellite orbital positions within national sovereignty and fulfilling the related liabilities, commissioning or having commissioned the satellites registered under its own name or belonging to other operators, operating such satellites, establishing communication and transmission infrastructure over the satellites belonging to national and foreign satellite operators, providing all kinds of services that can be technically carried out over the cable TV infrastructure, conducting satellite platform operation and carrying out commercial activities.

This is to confirm that based on the Law No. 406 and "Authorization Agreement Concerning the Execution of Satellite and Cable Tv Services" signed by and between Türksat and Information and Communication Technologies Authority of Government of Turkey, Türksat AS, acknowledges that it has informed the Information and Communication Technologies Authority of Government of Turkey that Intelsat 709 will be under license given by United States of America administration while the satellite operates temporarily at the 50° E.L. orbital position pursuant to the ITU filings of the Government of Turkey.

Sincerely Yours,

Nihat OKTAY

Vice President

Özkan DALBAY

Director General & President