

March 26, 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 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 60 days beginning July 1, 2010 to drift Intelsat 706 (call sign S2401) from 54.85° E.L. to 72.1° E.L. and begin operating at 72.1° E.L. Intelsat will shortly file an application for permanent authority to redeploy Intelsat 706 to 72.1° E.L., where it will operate in the C- and Ku-bands.

Intelsat 706 is currently operating at 54.85° E.L.² Following traffic transfer from Intelsat 706 to Intelsat 709 (call sign S2396)³ and subject to receipt of FCC approval, Intelsat 706 will be relocated to 72.1° E.L. where it will follow Intelsat 4 (call sign S2461), which recently was de-orbited due to an anomaly.⁴

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00668, File No. SAT-STA-20091222-00149 (Feb. 26, 2010) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00666, File No. SAT-STA-20100111-00006 (Feb. 19, 2010) (Public Notice) (granting 60-day STA to drift and operate at 54.85° E.L.). The modification application for permanent authority to operate the Intelsat 709 satellite at 54.85° E.L. remains pending. See *Intelsat North America, Application to Modify Authorization for Intelsat 709 (S2396)*, File No. SAT-MOD-20091106-00117 (filed Nov. 6, 2009). On March 15, 2010, Intelsat filed a request for STA 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. After this 10-day period, Intelsat 709 will return to the 54.85° E.L. orbital location. See *Request for Special Temporary Authority to Drift Intelsat 709, Call Sign S2396*, File No. SAT-STA-20100315-00046 (filed Mar. 15, 2010).

⁴ See *PanAmSat Licensee Corp. Request for Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite, Call Sign S2461*, File No. SAT-STA-20100205-00022 (stamp grant Mar. 8, 2010); *PanAmSat*

Ms. Marlene H. Dortch
March 26, 2010
Page 2

During the drift of Intelsat 706 from 54.85° E.L. to 72.1° 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 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

Grant of this STA request is in the public interest because it will allow Intelsat to begin drifting Intelsat 706 and operating the satellite at 72.1° E.L. as quickly as possible. This will allow Intelsat to again offer services to customers in the Indian Ocean region from this location following the emergency de-orbit of Intelsat 4.

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 72.1° E.L., Intelsat will operate the communications payload in conformance with Intelsat's coordination agreements related to the nominal 72.0° E.L. location.

Licensee Corp., Request for Extension of Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite, Call Sign S2461, File No. SAT-STA-20100212-00026 (stamp grant Mar. 8, 2010); PanAmSat Licensee Corp. Request for Further Extension of Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite, Call Sign S2461, File No. SAT-STA-20100224-00035 (stamp grant Mar. 8, 2010). On March 10, 2010, PanAmSat filed a notice of de-orbit, informing the Commission that the Intelsat 4 satellite had been de-orbited to an altitude of 914.5 km above the geostationary arc. See Letter from Susan H. Crandall to Marlene H. Dortch, Re: Intelsat 4 De-Orbit, Call Sign S2461 (filed Mar. 10, 2010).

Ms. Marlene H. Dortch

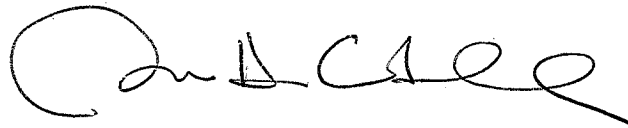
March 26, 2010

Page 3

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. Intelsat 706 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. 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 706 at 72.1° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 at 72.1° 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', written in a cursive style.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall