

June 10, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Extension of Special Temporary Authority to
Drift and Operate Intelsat 709
Call Sign S2396

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a 60-day extension -- from June 15, 2010 through August 13, 2010 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 709 (call sign S2396) from 85.15° E.L. to 54.85° E.L. and begin operating at 54.85° E.L.² Intelsat 709 is currently operating at 54.85° E.L. pursuant to the ITU filings of the Indian Administration.³ Intelsat has a pending application for permanent

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00666, File No. SAT-STA-20100111-00006 (Feb. 19, 2010) (Public Notice); Intelsat also has a pending request for extension of STA seeking authority through June 14, 2010, File No. SAT-STA-20100412-00074, (filed Apr. 12, 2010). Intelsat had also requested and was granted STA to continue to drift Intelsat 709 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. See *Policy Branch Information; Actions Taken*, Report No. SAT-00677, File No. SAT-STA-20100315-00046 (Apr. 2, 2010) (Public Notice).

³ Intelsat's latest extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. through December 31, 2010. That extension was attached to a previously-filed STA request (see File No. SAT-STA-20091201-00134) and is incorporated herein by reference. Intelsat anticipates entering into a further agreement with the Indian Administration that will allow Intelsat to operate a satellite in the Ku-band at 54.85° E.L. beyond June 30, 2010.

Ms. Marlene H. Dortch

June 10, 2010

Page 2

authority to redeploy Intelsat 709 to 54.85° E.L., where it will operate in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.⁴ Intelsat thus seeks extension of its original STA to continue operating at 54.85° E.L. pending action on the application for permanent authority.

Grant of this STA extension request is in the public interest because it will allow Intelsat to ensure continuity of service to customers in the Indian Ocean region at 54.85° E.L. Intelsat has a pending modification application to relocate the Intelsat 706 satellite from this location to 72.1° E.L.⁵

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 709 in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also will continue to operate Intelsat 709 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.⁶

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. Except during the transition of traffic from Intelsat 706, Intelsat 709 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

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).

⁵ See IBFS File Nos. SAT-MOD-20100511-00098 and SAT-AMD-20100104-00003; See *Satellite Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00662 (Jan. 29, 2010) (Public Notice). Intelsat also has a pending request for special temporary authority to relocate the Intelsat 706 satellite to 72.1° E.L. See IBFS File No. SAT-STA-20100326-00057; See *Satellite Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00693 (May 28, 2010) (Public Notice).

⁶ See *Policy Branch Information; Actions Taken*, Report No. SAT-00666, File No. SAT-STA-20100111-00006 (Feb. 19, 2010) (Public Notice).

Ms. Marlene H. Dortch

June 10, 2010

Page 3

overlapping station-keeping volume with Intelsat 709. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 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: Karl Kensinger
Kathryn Medley
Stephen Duall