

June 14, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554



Re: Request for Special Temporary Authority to Operate Intelsat 603 in C- and Ku-band Frequencies for 180 Days at 11.5° E.L.; Call Sign: S2399

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 180 days to operate certain C- and Ku-band communications frequencies, along with TT&C carriers, on the Intelsat 603 satellite (call sign S2399) at 11.5° E.L.

The Intelsat 603 satellite is currently located at 11.5° E.L.<sup>2</sup> and operating pursuant to an FCC grant of STA in the 4040-4200 MHz (space to Earth) and 6265-6425 MHz (Earth to space) frequencies, along with TT&C carriers.<sup>3</sup> Intelsat also has a pending request to re-flag Intelsat 603 from United States licensing to United Kingdom licensing.<sup>4</sup> Until such time as the exchange of licensing administrations can occur, Intelsat seeks STA to operate additional C- and Ku-band frequencies on the Intelsat 603 satellite at 11.5° E.L., along with

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

<sup>2</sup> See *Intelsat North America LLC Application for Special Temporary Authority for Intelsat 603 Satellite, S2399*, File No. SAT-STA-20091209-00143 (filed Dec. 9, 2009; granted with conditions Mar. 4, 2010).

<sup>3</sup> See *Intelsat North America LLC Application for Special Temporary Authority for Intelsat 603 Satellite, S2399*, File No. SAT-STA-20100519-00104 (filed May 19, 2010; granted with conditions May 20, 2010; expires June 18, 2010). Intelsat will file a renewal request for an additional 30 days to operate in the 4040-4200 MHz (space to Earth) and 6265-6425 MHz (Earth to space) frequencies, along with TT&C carriers, no later than June 15, 2010.

<sup>4</sup> See *Intelsat North America LLC Application to Transfer Control of Intelsat 603 Space Station Authorization to United Kingdom Licensing Authority*, File No. SAT-T/C-20100112-00008 (filed Jan. 12, 2010; supplemented February 16, 2010).

the C-band frequencies and TT&C carriers previously authorized. Intelsat will concurrently file a 30-day STA to operate in these additional bands so as to meet the service demands of a U.S. Government customer.

**Operational Frequencies:** The specific communications frequencies for which Intelsat seeks authority are:

3700-4200 MHz<sup>5</sup>  
5925-6425 MHz<sup>6</sup>  
10950-11200 MHz  
11450-11700 MHz  
14000-14500 MHz

**TT&C Frequencies:** The specific TT&C frequencies are:

Telecommand frequencies: 6173.7 MHz (LHCP) and 6176.3 MHz (LHCP)  
Telemetry frequencies: 3947.5 MHz (RHCP), 3948.0 MHz (RHCP),  
3952.0 MHz (RHCP) and 3952.5 MHz (RHCP)

**Geographic Service Area:** The communications frequencies being requested here will be received or transmitted through C-band beams that cover Europe, Africa, and small portions of Asia and South America and two Ku-band spot beams that cover east Africa and portions of the Middle East.

**Waivers:** Intelsat requests that, to the extent necessary, the Part 25 waivers originally granted to the Intelsat 603 spacecraft continue to apply at the 11.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i) and 25.211(a) of the Commission's rules.<sup>7</sup>

**Conditions.** Intelsat agrees to accept the following conditions on its use of the 10950-11200 MHz and 11450-11700 MHz frequencies:

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<sup>5</sup> Intelsat does not seek STA to operate Intelsat 603's 3625-3700 MHz payload.

<sup>6</sup> Intelsat does not seek STA to operate Intelsat 603's 5850-5925 MHz payload.

<sup>7</sup> See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

(1) Operations in the 10950-11200 MHz and 11450-11700 MHz frequency bands shall comply with the terms of footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference.

(2) Operations in the 10950-11200 MHz and 11450-11700 MHz frequency bands are limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

Grant of this application will serve the public interest by allowing Intelsat to operate in additional C- and Ku-band frequencies on the Intelsat 603 satellite and thus best meet its customers' needs – in particular, a U.S. Government customer seeking immediate coverage of the Middle East. Intelsat's prior request for STA contained only a limited number of frequencies required to transition two customers off the NSS-5 satellite. In addition, grant of this request will provide additional time for the FCC and regulatory agency in the United Kingdom, Ofcom, to reach an understanding on the transfer of licensing responsibility for the Intelsat 603 spacecraft.

Grant of this STA is not expected to cause any harmful interference. Intelsat will operate the C-band frequencies at levels low enough to ensure the protection of the W2A satellite operated by Eutelsat, which is the only C-band satellite within 5° of 11.5° E.L. Intelsat 603's Ku-band beams are pointed and will be operated in such a way that they have significant spatial and/or polarization isolation with respect to the operation of Eutelsat satellites at 10° E.L. and 13° E.L. Moreover, Intelsat agrees to operate the frequencies identified above on a non-interference, non-protected basis and in the unlikely circumstance that interference is generated to any other satellite, Intelsat agrees to immediately cease transmissions until the interference concerns of the interfered-with operator are satisfactorily resolved.

Upon grant, Intelsat shall prepare and submit to the FCC materials for submission to the ITU, pursuant to No. 8.4 of the Radio Regulations, in connection with the operation of Intelsat 603 at 11.5° E.L.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously process and grant this request for STA for 180 days to operate certain C- and Ku-band frequencies on Intelsat 603 at 11.5° E.L.

Sincerely,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
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