

July 27, 2010

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



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

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a 30-day extension -- through August 28, 2010 -- of the Special Temporary Authority ("STA"¹) previously granted Intelsat 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.²

Intelsat has a pending request to re-flag Intelsat 603 from United States licensing to United Kingdom licensing.³ Until such time as the exchange of licensing administrations can occur, Intelsat seeks an extension of STA to continue operating certain C- and Ku-band communications frequencies -- and TT&C carriers -- on the Intelsat 603 satellite at 11.5° E.L. to meet the on-going service demands of a U.S. Government customer. Intelsat also has filed a 180-day STA to operate in these bands.⁴

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-00704, File No. SAT-STA-20100614-00130 (Jul. 2, 2010) (Public Notice).

³ 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).

⁴ See *Policy Branch Information; Satellite Applications Accepted for Filing*, Report No. SAT-00703, File No. SAT-STA-20100614-00132 (Jul. 2, 2010) (Public Notice).

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

3700-4200 MHz⁵
5925-6425 MHz⁶
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: These communications frequencies will continue to 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.⁷

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

(1) Operations in the 10950-11200 MHz and 11450-11700 MHz frequency bands shall comply with the terms of footnote US211 to the

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

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

⁷ 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).

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 continue operating C- and Ku-band frequencies on the Intelsat 603 satellite and thus best meet its customers' needs – in particular, a U.S. Government customer utilizing coverage of the Middle East. 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 extension is not expected to cause any harmful interference. Intelsat will continue to 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 continue to 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 continue operating 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.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously process and grant this request for an extension of

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STA for 30 days to operate certain C- and Ku-band frequencies on Intelsat 603
at 11.5° E.L.

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: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall