

August 16, 2010

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



Re: Request for Further Extension of Special Temporary Authority for
Intelsat 801
Call Sign: S2391

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests an additional 60-day extension -- through October 18, 2010 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 801 from 31.5° W.L. to 29.5° W.L. and operate temporarily at the 29.5° W.L. location.² Intelsat has a pending application for permanent authority to redeploy Intelsat 801 to 29.5° W.L.,³ where it is currently co-located with Intelsat 705.⁴

Intelsat 801 currently is located at 29.5° W.L., where it is operating both the TT&C and payload frequencies previously temporarily authorized.⁵ Grant of this STA extension request is in the public interest because it will allow

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-00668, File No. SAT-STA-20091216-00146 (Feb. 26, 2010) (Public Notice); *Actions Taken*, Report No. SAT-00690, File No. SAT-STA-20100416-00079 (May 14, 2010) (Public Notice); *Request for Special Temporary Authority for Intelsat 801*, File No. SAT-STA-20100616-00139 (stamp grant with conditions Aug. 6, 2010).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00667, File No. SAT-MOD-20100208-00024 (Feb. 26, 2010) (Public Notice); *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00678, File No. SAT-AMD-20100316-00050 (Apr. 2, 2010) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. 00670, File No. SAT-STA-20100205-00023 (Mar. 5, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100423-00083 (May 7, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. 00709, File No. SAT-STA-20100624-00146 (Jul. 23, 2010) (Public Notice).

⁵ As previously noted, the 12.5-12.75 GHz frequencies will be used only in ITU Region 1.

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Intelsat to ensure continuity of service to C-band customers on Intelsat 801, as well as to offer Ku-band capacity at 29.5° W.L.

Grant of this STA further extension request will not result in increased risk of harmful interference. As noted in the original STA request, Intelsat will operate the satellite's C- and Ku-band communications and TT&C frequencies in conformance with its coordination agreements applicable to operation at the 29.5° W.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. Except for Intelsat 705, Intelsat 801 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.⁶ Further, except for Intelsat 705, 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 801 at 29.5° W.L. Finally, Intelsat is not aware of any satellite network with an overlapping station-keeping volume with Intelsat 801 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 grant this STA further extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

⁶ Intelsat will continue to operate both satellites in the 29.5° +/- 0.05° station-keeping box. Both satellites operate in inclined orbit.