

August 16, 2010

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



Re: Request for Special Temporary Authority to De-Orbit the Intelsat 802  
Satellite, Call Sign S2402

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat"), pursuant to Section 25.120 of the rules of the Federal Communications Commission ("FCC" or "Commission"),<sup>1</sup> herein requests Special Temporary Authority ("STA"), beginning on September 6, 2010 and lasting for a period of thirty days, to de-orbit the Intelsat 802 satellite (Call Sign S2402) from its current location at 32.9° E.L.<sup>2</sup> and to perform telemetry, tracking and command ("TT&C") functions with Intelsat 802 during this maneuver.

Grant of this STA is in the public interest. The Intelsat 802 satellite was launched in 1997 and is nearing the end of its useful life. Intelsat seeks to commence de-orbiting the spacecraft sometime between September 6, 2010 and October 5, 2010.

Intelsat intends to de-orbit the Intelsat 802 satellite to a perigee 150 km above synchronous altitude. Intelsat has reserved 12.26 kilograms of fuel for this purpose. To calculate the reserved fuel figure, Intelsat used the "rocket equation" – *i.e.*, it used the expected mass of the satellite at the end of life and the required delta-velocity to achieve the desired orbit. Intelsat has assessed the fuel gauging uncertainty and believes it has provided an adequate margin of fuel reserve to address the uncertainty in the remaining propellant. As a satellite launched prior to March 18, 2002, the minimum perigee requirements for decommissioning set forth in Section 25.283(a) of the Commission's rules do not apply to Intelsat 802.<sup>3</sup>

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<sup>1</sup> 47 C.F.R. § 25.120.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00231, File No. SAT-MOD-20040527-00107 (July 30, 2004).

<sup>3</sup> 47 C.F.R. § 25.283(d).

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The de-orbit of Intelsat 802 will not cause any significant risk of harmful interference to other satellites. During the de-orbit, the satellite's communications payload will remain inactive and only the TT&C payload will operate. Intelsat requests authority to operate the following TT&C frequencies: 6173.7 MHz (LHCP) and 6176.3 MHz (RHCP) (command uplink); 3947.5 MHz (RHCP), 3948.0 MHz (RHCP), 3952.5 MHz (RHCP), and 3952.0 MHz (RHCP) (telemetry downlink). These frequencies will be coordinated and will operate on a non-interference basis.<sup>4</sup>

Finally, consistent with Section 25.283(c), upon completion of de-orbit maneuvers, all stored energy sources will be discharged by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request for special temporary authority to de-orbit the Intelsat 802 satellite.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Bob Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall

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<sup>4</sup> See 47 C.F.R. § 25.283(b).