

August 23, 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 705 to Drift to and Operate at 330.5° E.L. (29.5° W.L.)
Call Sign: S2395

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests an additional 60-day extension – through October 25, 2010 – of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift the Intelsat 705 satellite (call sign S2395) from 310.0° E.L. (50° W.L.) to 330.5° E.L. (29.5° W.L.) and then operate the satellite at the 330.5° E.L. (29.5° W.L.) location.² Intelsat has a pending application to modify the Intelsat 705 license to allow it to relocate the satellite to, and operate at, 330.5° E.L. (29.5° W.L.),³ where it is currently co-located with Intelsat 801.⁴

Grant of this STA further extension request is in the public interest because it will enable Intelsat to continue to provide robust service to customers.

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-00670, File No. SAT-STA-20100205-00023-00023 (Mar. 5, 2010) (Public Notice); Report No. SAT-00687, File No. SAT-STA-20100423-00083 (May 7, 2010) (Public Notice); Report No. SAT-00709, File No. SAT-STA-20100624-00146 (Jul. 23, 2010) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00669, File No. SAT-MOD-20100115-00010 (Mar. 5, 2010).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00668, File No. SAT-STA-20091216-00146 (Feb. 26, 2010) (Public Notice); Report No. SAT-00690, File No. SAT-STA-20100416-00079 (May 14, 2010); Report No. SAT-00715, File No. SAT-STA-20100616-00139 (Aug. 13, 2010); *Intelsat North America LLC, Request for Extension of Special Temporary Authority for Intelsat 801*, File No. SAT-STA-20100816-00177 (filed Aug. 16, 2010).

Grant of the STA further extension also will serve the public interest by affording the Commission additional time to complete its review of Intelsat's pending modification application to relocate Intelsat 705 to, and operate at, 330.5° E.L. (29.5° W.L.). Intelsat understands and accepts that a grant to further extend this STA would not prejudice the Commission's determination of Intelsat's request to operate Intelsat 705 at 330.5° E.L. (29.5° W.L.) on a permanent basis, and operation of the satellite at that location pursuant to STA is at Intelsat's risk.

Grant of this STA further extension request will not result in increased risk of harmful interference. At the 330.5° E.L. (29.5° W.L.) location, Intelsat will continue to operate the satellite's communications payload in conformance with its coordination agreements covering the location as well as the Commission's rules regarding two-degree spacing.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Except for Intelsat 801, Intelsat 705 is not located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁵ Further, except for Intelsat 801, 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 705 at 330.5° E.L. (29.5° W.L.). Finally, Intelsat is not aware of any satellite network with an overlapping station-keeping volume with Intelsat 705 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁵ Intelsat will operate both satellites in the 29.5° +/- 0.05° station-keeping box. Both satellites operate in inclined orbit, which facilitates sharing of the station-keeping box.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this further extension request.

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