

October 6, 2010

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



Re: Request for Special Temporary Authority for Intelsat 705 to Drift to  
304.6° E.L. (55.4° W.L.)  
Call Sign: S2395

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 100 days – from November 30, 2010 through March 9, 2011 – to drift the Intelsat 705 satellite (call sign S2395) from 330.5° E.L. (29.5° W.L.)<sup>2</sup> to 304.6° E.L. (55.4° W.L.). Intelsat expects to have the satellite on-station at 304.6° E.L. at the end of February 2011. Intelsat intends shortly to file an STA request to temporarily operate the Intelsat 705 satellite at 304.6° E.L. (55.4° W.L.), where it will be located adjacent to Intelsat 805, which is located at 304.5° E.L. (55.5° W.L.),<sup>3</sup> beginning in March 2011.<sup>4</sup> Intelsat 705 currently is co-located with the Intelsat 801 satellite (call sign S2391) at 330.5° E.L., and no frequencies will be left vacant at 330.5° E.L. as a result of this STA.<sup>5</sup>

<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 *Policy Branch Information; Actions Taken*, Report No. SAT-00723, File No. SAT-MOD-20100115-00010 (Sept. 24, 2010) (Public Notice).

<sup>3</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).

<sup>4</sup> Intelsat expects to de-orbit Intelsat 705 from the 304.6° E.L. (55.4° W.L.) location. The satellite's estimated end of maneuver life, assuming the drift, is January 2012. The Commission previously approved the de-orbit plan for Intelsat 705. See *Intelsat North America LLC, Application to Modify Authorization for Intelsat 705 (S2395)*, File No. SAT-MOD-20100115-00010 (filed Jan. 15, 2010) (stamp granted with conditions Sept. 17, 2010).

<sup>5</sup> See *Intelsat North America LLC, Application to Modify Authorization for Intelsat 801 (S2391)*, File No. SAT-MOD-20100208-00024 (filed Feb. 8, 2010) (stamp granted with conditions Sept. 23, 2010).

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During the drift, Intelsat will utilize only Intelsat 705's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP)

6176.3 MHz (LHCP)

Downlink:

3947.5 MHz (RHCP)

3948.0 MHz (RHCP)

3952.5 MHz (RHCP)

3952.0 MHz (RHCP)

Grant of this STA request is in the public interest because it will enable Intelsat to begin drifting Intelsat 705 in order to satisfy customer capacity requirements at 304.6° E.L. (55.4° W.L.). Specifically, a customer will commence service on Intelsat 705 until the planned relocation of another Intelsat satellite to the nominal 304.5° E.L. location in mid-2011. Intelsat understands and accepts that a grant of this drift STA would not prejudice the Commission's determination of Intelsat's request to operate Intelsat 705 temporarily at 304.6° E.L. (55.4° W.L.), and relocation of the satellite to that location pursuant to STA is at Intelsat's risk.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. At 304.6° E.L. (55.4° W.L.), Intelsat will operate only the satellite's TT&C frequencies unless separately authorized also to operate the communications payload.

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. Intelsat 705 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-

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keeping volume with another satellite.<sup>6</sup> Further, 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 304.6° E.L. (55.4° 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.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall

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<sup>6</sup> Intelsat 705 will continue to be operated in inclined orbit.