

October 12, 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 Conduct In-Orbit Testing of Intelsat 17; Call Sign: S2814

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from December 1, 2010 through December 30, 2010, to conduct in-orbit testing ("IOT") of Intelsat 17 (call sign S2814) at 63.15° E.L. in the bands 3625-4200 MHz (downlink), 5850-6425 MHz (uplink), 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz (downlink), and 13750-14500 MHz (uplink) and to drift the satellite to its permanent location of 66.0° E.L.² Intelsat 17 currently is scheduled to be launched as early as November 24, 2010. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 17, Intelsat will operate in the above referenced C- and Ku-bands. Intelsat has coordinated the planned in-orbit testing of Intelsat 17 with all operators of satellites operating co-frequency up to six degrees away from 63.15° E.L. Specifically, Intelsat has coordinated the proposed testing with Inmarsat, which operates the Inmarsat 3F1 satellite at 64.5° E.L. In addition, Intelsat has internally coordinated the proposed testing with the following of its satellites: Intelsat 904 (call sign S2408) at 60.0° E.L., Intelsat 902 (call sign S2406) at 62.0° E.L., Intelsat 906 (call sign S2410) at 64.15° E.L., Intelsat 702 (call sign S2388) at 66.0° E.L., Intelsat 10 (call sign S2382) at 68.5° E.L., and Intelsat 7 (call sign S2229) at 68.65° E.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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

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; Satellite Space Authorizations Accepted for Filing*, Report No. SAT-00714, File No. SAT-LOA-20100726-00167 (Aug. 27, 2010) (Public Notice). During the drift from 63.15° E.L. to 66.0° E.L., only the satellite's TT&C frequencies will be utilized.

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space stations during in-orbit testing at 63.15° E.L. Intelsat 17 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. 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 17. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 17 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 17 at 63.15° E.L. is a critical step in ensuring that the satellite will be fully operational at 66.0° E.L. This, in turn, will ensure continuity of service to customers at the 66.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel

Intelsat Corporation

Cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall