

October 13, 2010

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



Re: Request for Special Temporary Authority to Operate Intelsat 705 at
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")¹ for 180 days commencing March 1, 2011 to operate the Intelsat 705 satellite (call sign S2395) at 304.6° E.L. (55.4° W.L.). Subject to receipt of FCC approval, Intelsat expects to begin drifting the satellite from 330.5° E.L. (29.5° W.L.)² to 304.6° E.L. in late November and expects to have the satellite on-station at 304.6° E.L. at the end of February 2011.³ At 304.6° E.L. (55.4° W.L.), Intelsat 705 will be located adjacent to Intelsat 805, which operates at 304.5° E.L. (55.5° W.L.).⁴ Intelsat expects to de-orbit Intelsat 705 from the 304.6° E.L. location.⁵

Specifically, Intelsat requests authority to operate the following frequencies on Intelsat 705 at 304.6° E.L. (55.4° W.L.).

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-00723, File No. SAT-MOD-20100115-00010 (Sept. 24, 2010) (Public Notice)

³ See *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20101006-00210 (filed Oct. 6, 2010).

⁴ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku²-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).

⁵ 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).

TT&C frequencies:

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)

Communications frequencies:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz,
10950 – 11200 MHz
11450 – 11700 MHz
11700 – 11950 MHz⁶

Grant of this STA request is in the public interest because it will enable Intelsat 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.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Intelsat 705's TT&C and communications

⁶ Although Intelsat 705 also has the bands 12.5-12.75 GHz, Intelsat does not plan to use these frequencies on Intelsat 705 at 304.6° E.L.

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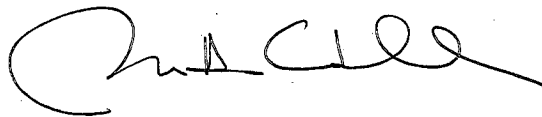
frequencies in accordance with its coordination agreements regarding the nominal 304.5° E.L. orbital location.

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-keeping volume with another satellite.⁷

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

⁷ Intelsat 705 will continue to be operated in inclined orbit.