

December 3, 2010

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



Re: Request for Special Temporary Authority for Intelsat 702
Call Sign: S2388

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days commencing March 15, 2011 to drift Intelsat 702 to 72.10° E.L. and temporarily operate the satellite at that location. As further explained below, Intelsat plans to redeploy Intelsat 702 temporarily to 72.10° E.L. because the satellite currently operating at 72.10° E.L. – Intelsat 706 – must be placed in inclined orbit earlier than originally expected.

Intelsat 702 currently is located at 66.0° E.L.,² but is shortly to be replaced by Intelsat 17.³ Following traffic transfer from Intelsat 702 to Intelsat 17, and subject to receipt of Commission approval, Intelsat plans to relocate Intelsat 702 temporarily to 72.10° E.L. commencing March 15, 2011 and have the satellite on-station at that location on or about April 1, 2011. Intelsat expects to operate Intelsat 702 at 72.10° E.L. until it is replaced by Intelsat 709.⁴

During the drift of Intelsat 702 from 66.0° E.L. to 72.10° E.L., Intelsat will utilize only the satellite'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 and 6176.3 MHz (LHCP)

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-00595, File No. SAT-MOD-20081217-00233 (Apr. 10, 2009) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00739, File No. SAT-LOA-20100726-00167 (Nov. 19, 2010) (Public Notice). Intelsat 17 was successfully launched on November 26, 2010.

⁴ Intelsat will shortly file an STA request for authority to redeploy Intelsat 709.

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Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)
3952.5 MHz and 3952.0 MHz (RHCP)

Once on-location at 72.10° E.L., Intelsat will operate the following communications payload frequencies on Intelsat 702:

Uplink:

5925-6425 MHz
14.0-14.5 GHz

Downlink:

3700-4200 MHz
10.95-11.2 GHz
11.45-11.7 GHz
12.5-12.75 GHz⁵

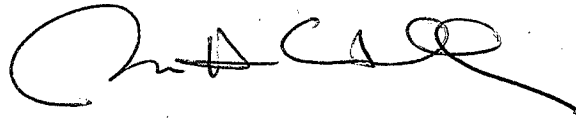
Grant of this STA request will serve the public interest by ensuring continuity of service to customers at 72.10° E.L. that require station-kept capacity, in light of the earlier-than-expected need to place Intelsat 706 in inclined orbit. In addition, grant of this STA request will not result in increased risk of harmful interference. As noted above, during the drift of Intelsat 702 from 66.0° E.L. to 72.10° E.L., Intelsat will utilize only the TT&C frequencies listed above and will coordinate the drift with all operators in the drift path. Once the satellite is on-station at 72.10° E.L., Intelsat will operate the satellite's TT&C and communications payload frequencies consistent with Intelsat's sister company -- PanAmSat Licensee Corp.'s -- coordination agreements for the nominal 72.0° E.L. location.

⁵ Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 72.10° E.L. orbital location. All of the payload frequencies on Intelsat 702 are contained on Intelsat 17. The frequencies on Intelsat 702 are identical to those on Intelsat 706.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this 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 a long horizontal stroke extending to the right.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Bob Nelson
Stephen Duall
Kathryn Medley