

December 7, 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 to
Drift and Operate Intelsat 709
Call Sign S2396

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests an additional 60-day extension -- from December 12, 2010 through February 9, 2011 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 709 (call sign S2396) from 85.15° E.L. to 54.85° E.L. and begin operating at 54.85° E.L.² Intelsat 709 is currently operating at 54.85° E.L. pursuant to the ITU filings of the Indian Administration.³ Intelsat has a pending application for permanent authority to redeploy Intelsat 709 to 54.85° E.L., where it will operate in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.⁴ Intelsat thus seeks further extension of its

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-00730*, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice); *Actions Taken, Report No. SAT-00666*, File No. SAT-STA-20100111-00006 (Feb. 19, 2010) (Public Notice); *Policy Branch Information; Actions Taken, Report No. SAT-00702*, File No. SAT-STA-20100412-00074, (Jun. 25, 2010) (Public Notice); *Policy Branch Information; Actions Taken, Report No. SAT-00706*, File No. SAT-STA-20100610-00128 (Jul. 9, 2010) (Public Notice); *Policy Branch Information; Actions Taken, Report No. SAT-00717*, File No. SAT-STA-20100810-00175 (Aug. 27, 2010) (Public Notice).

³ Intelsat's latest extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. through March 31, 2011 and is attached hereto.

⁴ See *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Report No. SAT-00662, File Nos. SAT-MOD-20091106-00117 and SAT-AMD-20100104-00003 (Jan. 29, 2010) (Public Notice).

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original STA to continue operating at 54.85° E.L. pending action on the application for permanent authority.

Grant of this STA further extension request is in the public interest because it will allow Intelsat to ensure continuity of service to customers in the Indian Ocean region at 54.85° E.L. Grant also will allow the Commission more time in which to consider the pending application for permanent authority.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 709 in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also will continue to operate Intelsat 709 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.⁵

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 space stations. Intelsat 709 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 709. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁵ See *Policy Branch Information; Actions Taken, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).*

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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 written in a cursive style with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Attachment

cc: Karl Kensinger
Kathryn Medley
Stephen Duall