

January 7, 2011

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



Re: Request for Special Temporary Authority to Drift and Operate
Intelsat 709
Call Sign S2396

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days beginning June 1, 2011 to drift Intelsat 709 (call sign S2396) from 54.85° E.L. to 72.10° E.L. and begin operating at 72.10° E.L. At 72.10° E.L., Intelsat 709 will replace Intelsat 702, which Intelsat expects temporarily to relocate to 72.10° E.L. to provide station-kept service continuity.²

Intelsat 709 is currently authorized to operate at 54.85° E.L. pursuant to the ITU filings of the Indian Administration.³ Following traffic transfer from Intelsat 709 to other satellites, Intelsat 709 will be relocated to 72.10° E.L. where it will replace Intelsat 702. Intelsat 706, which currently operates at the 72.10° E.L. location,⁴ must be placed in inclined orbit sooner than originally

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 *Intelsat North America Request for Special Temporary Authority*, File No. SAT-STA-20101203-00255 (filed Dec. 3, 2010).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00745, File No. SAT-STA-20101207-00256 (Dec. 17, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).

⁴ See *Intelsat North America Request for Extension of Special Temporary Authority*, File No. SAT-STA-20101220-00265 (filed Dec. 20, 2010); *Policy Branch Information; Actions Taken*, Report No. SAT-00736, File No. SAT-STA-20101022-00223 (Nov. 12, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00720, File No. SAT-STA-20100824-00181 (Sept. 10, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00718, File No. SAT-STA-20100326-00057 (Sept. 3, 2010) (Public Notice).

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expected.⁵ Accordingly, Intelsat 709 -- like Intelsat 702 before it -- is being redeployed to 72.10° E.L. in order to provide continuity of service to customers requiring station-kept capacity. Subject to receipt of FCC approval, Intelsat expects to begin drifting Intelsat 709 on June 1, 2011 and have the satellite on-station at 72.10° E.L. in mid-July 2011.

During the drift of Intelsat 709 from 54.85° 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 (LHCP)

6176.3 MHz (LHCP)

Downlink:

3947.5 MHz (RHCP)

3948.0 MHz (RHCP)

3952.5 MHz (RHCP)

3952.0 MHz (RHCP)

Once located at 72.10° E.L., Intelsat will operate the satellite's communications frequencies, as follows:

Downlink:

3700-4200 MHz

10950-11200 MHz

11450-11700 MHz

12500-12750 MHz

⁵ Intelsat currently expects to put Intelsat 706 in inclined orbit in May/June 2011. If Intelsat determines the satellite can remain station-kept beyond that time, Intelsat may not need to move Intelsat 702 to 72.10° E.L. temporarily.

Uplink:

5925-6425 MHz
14000-14500 MHz⁶

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of station-kept service at the 72.10° E.L. location.⁷ Intelsat expects to have a new satellite – Intelsat 22 – launched to 72.10° E.L. in the first or second quarter of 2012.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed 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. Once on-station at 72.10° E.L., Intelsat will operate the communications payload and TT&C frequencies in conformance with Intelsat's sister company -- PanAmSat Licensee Corp.'s -- coordination agreements regarding the nominal 72.0° E.L. orbital location.

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. Except for Intelsat 702 and Intelsat 706, 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.⁸ 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.

⁶ The frequency band 11700-11950 MHz is also on Intelsat 709, but will not be utilized at 72.10° E.L.

⁷ As noted above, all customers operating on Intelsat 709 at 54.85° E.L. at the time of the planned redeployment to 72.10° E.L. will be accommodated on other satellites prior to the satellite's drift.

⁸ Intelsat 709, Intelsat 702 and Intelsat 706 will briefly occupy the same station-keeping box at 72.10° E.L. while traffic is transferred from Intelsat 702 to Intelsat 709. Once traffic transfer is complete, Intelsat 702 will be relocated. Intelsat 709 and Intelsat 706 will continue to be operated in the same station-keeping box.

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Intelsat also requests that the Part 25 waivers originally granted to the Intelsat 709 spacecraft continue to apply at the 72.10° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i) and 25.211(a) of the Commission's rules.⁹

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Kathryn Medley

⁹ 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 Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).