

February 3, 2011

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



Re: Request for Further Extension of Special Temporary Authority to Operate Intelsat 709, Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") (f/k/a Intelsat North America LLC) herein requests an additional 50-day extension -- from February 10, 2011 through March 31, 2011 -- of the Special Temporary Authority ("STA")<sup>1</sup> 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.<sup>2</sup> Intelsat 709 is currently operating at 54.85° E.L. pursuant to the ITU filings of the Indian Administration.<sup>3</sup> Intelsat has a pending application for permanent authority to redeploy Intelsat 709 to 54.85° E.L. and operate in the C- and Ku- bands pursuant to the ITU filings of the Indian Administration.<sup>4</sup> Intelsat also recently has filed an STA request to

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> 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); *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).

<sup>3</sup> Intelsat's latest extension of its agreement with the Indian Administration, which allows Intelsat to operate a satellite at 54.85° E.L. through March 31, 2011, was attached to Intelsat's previous STA extension request and is incorporated herein by reference. See *Policy Branch Information; Actions Taken, Report No. SAT-00745*, File No. SAT-STA-20101207-00256 (Dec. 17, 2010) (Public Notice).

<sup>4</sup> 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).

Ms. Marlene H. Dortch

February 3, 2011

Page 2

redeploy Intelsat 709 from 54.85° E.L. to 72.10° E.L. beginning March 15, 2011.<sup>5</sup> Intelsat seeks further extension of its original STA in order to continue operating at 54.85° E.L. pending action on the STA request to redeploy the satellite to 72.10° E.L.

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. until the satellite is redeployed to 72.10° E.L. Grant also will allow the Commission more time in which to consider the pending application for permanent authority to the extent necessary.

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.<sup>6</sup>

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.

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<sup>5</sup> See *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20110107-00006 (filed Jan. 7, 2011).

<sup>6</sup> See *Policy Branch Information; Actions Taken, Report No. SAT-00730*, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).

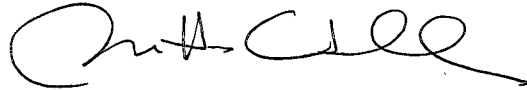
Ms. Marlene H. Dortch

February 3, 2011

Page 3

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 "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Karl Kensinger  
Kathryn Medley  
Stephen Duall