

February 22, 2011

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
Operate Intelsat 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") (f/k/a Intelsat North America LLC) herein requests an additional 60 days -- from February 26, 2011 through April 26, 2011 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 706 (call sign S2401) from 54.85° E.L. to 72.1° E.L. and operate at 72.1° E.L.² Intelsat has a pending application for permanent authority to redeploy Intelsat 706 to 72.1° E.L., where it will operate in the C- and Ku-bands.³

Intelsat 706 is currently operating at 72.1° E.L.⁴ At that location, Intelsat 706 followed Intelsat 4 (call sign S2461), which was de-orbited due to an anomaly.⁵

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

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00748, File No. SAT-STA-20101220-00265 (Jan. 7, 2011) (Public Notice); *Actions Taken*, Report No. SAT-00736, File No. SAT-STA-20101022-00223 (Nov. 12, 2010) (Public Notice); *Actions Taken*, Report No. SAT-00693, File No. SAT-STA-20100326-00057 (May 28, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00720, SAT-STA-20100824-00181 (Sept. 10, 2010) (Public Notice).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00703, File No. SAT-MOD-20100511-00098 (Jul. 2, 2010) (Public Notice).

⁴ The satellite arrived at 72.1° E.L. in early August 2010.

⁵ See *PanAmSat Licensee Corp. Request for Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite, Call Sign S2461*, File No. SAT-STA-20100205-00022 (stamp grant Mar. 8, 2010); *PanAmSat Licensee Corp., Request for Extension of Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite, Call Sign S2461*, File No. SAT-STA-20100212-00026 (stamp grant Mar. 8,

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Intelsat will continue to utilize the following TT&C frequencies on Intelsat 706 at 72.1° E.L.:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

Intelsat will continue to utilize the following communications frequencies on Intelsat 706 at 72.1° E.L.:

3700 – 4200 MHz (space-to-Earth)
5925 – 6425 MHz (Earth-to-space)
10950 – 11200 MHz (space-to-Earth)
11450 – 11700 MHz (space-to-Earth)
12500 – 12750 MHz (space-to-Earth)
14000 – 14500 MHz (Earth-to-space)

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue offering services to customers in the Indian Ocean region from this location following the emergency de-orbit of Intelsat 4.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate the

2010); *PanAmSat Licensee Corp. Request for Further Extension of Special Temporary Authority to Conduct Emergency Operations for the Intelsat 4 Satellite*, Call Sign S2461, File No. SAT-STA-20100224-00035 (stamp grant Mar. 8, 2010). On March 10, 2010, PanAmSat filed a notice of de-orbit, informing the Commission that the Intelsat 4 satellite had been de-orbited to an altitude of 914.5 km above the geostationary arc. See *Letter from Susan H. Crandall to Marlene H. Dortch, Re: Intelsat 4 De-Orbit*, Call Sign S2461 (filed Mar. 10, 2010).

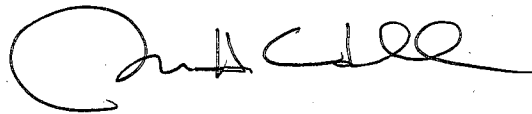
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communications payload in conformance with Intelsat's coordination agreements related to the nominal 72.0° E.L. location.

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. Other than Intelsat 709, Intelsat 706 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.⁶ 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 706 at 72.1° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 72.1° E.L. 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 expeditiously grant this further extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathyrn Medley
Stephen Duall

⁶ Intelsat plans to relocate Intelsat 709 to 72.10° E.L. in June 2011 to provide continuity of service to customers requiring station-kept capacity at that location. See *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20110107-00006 (filed Jan. 7, 2011).