

March 2, 2011

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



Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of New Dawn; Call Sign: S2751

Dear Ms. Dortch:

Intelsat New Dawn Company, Ltd. ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days, from April 5, 2011 through May 4, 2011, to conduct in-orbit testing ("IOT") of New Dawn (call sign S2751) at 23.1° E.L. in the bands 3620-4200 MHz (downlink), 5850-6500 MHz (uplink), 10950-11200 MHz and 11450-11700 MHz (downlink), and 14000-14500 MHz (uplink) and to drift the satellite to its permanent location of 32.8° E.L.<sup>2</sup> New Dawn currently is scheduled to be launched March 29, 2011. In support of its request, Intelsat submits the following information.

During in-orbit testing of New Dawn, Intelsat will operate in the above referenced C- and Ku-bands. Intelsat is coordinating the planned in-orbit testing of New Dawn with all operators of satellites operating co-frequency up to six degrees away from 23.1° E.L. Specifically, Intelsat is coordinating the proposed testing with Eutelsat, which operates Eurobird 1 at 28.47° E.L., Eurobird 2 at 25.50° E.L. and Eutelsat W6 at 21.60° E.L.; SES Astra, which operates Astra 2A at 28.24° E.L., Astra 2B at 28.18° E.L., Astra 2D at 28.19° E.L., Astra 3A at 23.47° E.L., Astra 3B at 23.55° E.L., Astra 1H at 19.23° E.L., Astra 1KR at 19.18° E.L., Astra 1L at 19.15° E.L. and Astra 1M at 19.21° E.L.; Inmarsat, which operates Inmarsat 4F2 at 25.06° E.L. and Inmarsat 3F5 at 24.75° E.L.; and Arabsat, which operates Badr 6 at 25.93° E.L. and Arabsat 2B at 20.0° E.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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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-00574, File No. SAT-LOA-20080509-00101 (Jan. 16, 2009) (Public Notice); *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00752, File No. SAT-MOD-20101029-00228 (Jan. 21, 2011) (Public Notice). During the drift from 23.1° E.L. to 32.8° E.L., only the satellite's TT&C frequencies will be utilized.

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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 during in-orbit testing at 23.1° E.L. New Dawn 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 New Dawn. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with New Dawn that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of New Dawn 23.1° E.L. is a critical step in ensuring that the satellite will be fully operational at 32.8° E.L. This, in turn, will ensure continuity of service to customers at the 32.8° E.L. location, and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission 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: Robert Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall