

March 16, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 License LLC (formerly known as Intelsat North America LLC) ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 180 days beginning May 15, 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 provide station-kept service continuity to Intelsat 706 customers when the latter satellite is placed in inclined orbit.

Intelsat 709 is currently authorized to operate at 54.85° E.L. pursuant to the ITU filings of the Indian Administration.<sup>2</sup> Following traffic transfer from Intelsat 709 to other satellites, Intelsat 709 will be relocated to 72.10° E.L. Intelsat 706, which currently operates at the 72.10° E.L. location,<sup>3</sup> must be placed in inclined orbit sooner than originally expected.<sup>4</sup> Accordingly, Intelsat 709 is being redeployed to 72.10° E.L. in order to provide continuity of service to customers requiring station-kept capacity at that location. Subject to receipt of FCC approval, Intelsat expects to begin drifting Intelsat 709 on May 15, 2011 and have the satellite on-station at 72.10° E.L. in early July 2011.

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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).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00763, File No. SAT-STA-20110222-00031 (Mar. 4, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00748, File No. SAT-STA-20101220-00265 (Jan. 7, 2011) (Public Notice); *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).

<sup>4</sup> Intelsat currently expects to put Intelsat 706 in inclined orbit in July 2011.

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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

Uplink:

5925-6425 MHz  
14000-14500 MHz<sup>5</sup>

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.<sup>6</sup> Intelsat expects to have a new satellite – Intelsat 22 – launched to 72.10° E.L. in the first or second quarter of 2012.

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<sup>5</sup> The frequency band 11700-11950 MHz is also on Intelsat 709, but will not be utilized at 72.10° E.L.

<sup>6</sup> 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.

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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 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.<sup>7</sup> 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.

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.<sup>8</sup>

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<sup>7</sup> Intelsat 709 and Intelsat 706 will be operated in the same station-keeping box.

<sup>8</sup> 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).

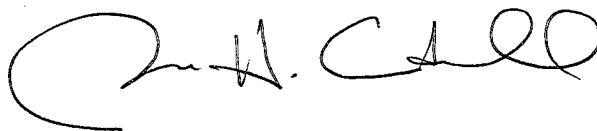
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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with the first name "Susan" being the most prominent part.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Kathryn Medley