

March 25, 2011

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



Re: Request for Special Temporary Authority to Continue Operating the Communications Payload on Intelsat 709 at 54.85° E.L., Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC (f/k/a Intelsat North America LLC) (“Intelsat”) herein requests Special Temporary Authority (“STA”)¹ for 30 days—from April 1, 2011 through April 30, 2011—to continue operating the communications payload on the Intelsat 709 satellite (call sign S2396) at the 54.85° E.L. orbital location.

Intelsat 709 is currently operating at 54.85° E.L. pursuant to the International Telecommunication Union (“ITU”) filings of the Indian Administration. The FCC authorization for Intelsat 709 to operate at this location includes the following condition:

“19. Intelsat is authorized to operate the communications payload of the Intelsat 709 satellite at the 54.85° E.L. orbital location until expiration of its current agreement with ISRO, which has been extended until March 31, 2011. *See* Attachment, IBFS File No. SAT-STA-20101207-00256. After this date, Intelsat must either seek authority from the commission to extend the term of this authorization or cease operating the communications payload of the Intelsat 709 at the 54.85° E.L. orbital location. Intelsat may continue to operate the TT&C payload after this date.”²

The purpose of this STA request is to seek continued authority to operate Intelsat 709 at 54.85° E.L. prior to its planned relocation to the 72.10° E.L.

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 *Intelsat North America LLC, Modification to Relocate and Operate Intelsat 709 at 54.85 E.L.*, IBFS File No. SAT-MOD-20091106-00117, Condition 19 (stamp grant with conditions, Feb. 11, 2011).

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orbital location on May 15, 2011.³ Intelsat will file another STA request seeking the necessary authority to operate Intelsat 709 through the end of May 2011. Prior to the relocation of Intelsat 709, and subject to receipt of FCC approval, traffic at the 54.85° E.L. orbital location will be transferred to the Intelsat 702 satellite.⁴

Intelsat expects to extend its current agreement with the Indian Administration and will file a copy of the extension when it becomes available.

All information regarding the operation of the Intelsat 709 satellite at 54.85° E.L. has been provided in Intelsat's current authorization and is incorporated herein by reference.⁵ Intelsat will continue to comply with all conditions of its authorization to operate at the 54.85° E.L. orbital location, and asks that the Part 25 waivers originally granted to the Intelsat 709 spacecraft continue to apply, 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.⁶

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service at the 54.85° E.L. location pending arrival of the Intelsat 702 satellite. Moreover, grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate pursuant to its current authorization.

³ *Request for Special Temporary Authority to Drift and Operate Intelsat 709*, File No. SAT-STA-20110316-00055 (filed Mar. 16, 2011).

⁴ *See Request for Special Temporary Authority to Drift and Operate Intelsat 702, Call Sign S2388*, File No. SAT-STA-20110307-00051 (filed Mar. 7, 2011).

⁵ *See supra* note 2.

⁶ *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 and 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 a large initial "S" and "C".

Susan H. Crandall

Assistant General Counsel

Intelsat Corporation

cc: Stephen Duall

Kathryn Medley