

April 26, 2011

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



Re: Request for Extension of Special Temporary Authority to Continue  
Operating Intelsat 709 at 54.85° E.L., Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 30-day extension -- from May 1, 2011 through May 30, 2011 -- of the Special Temporary Authority<sup>1</sup> previously granted Intelsat to continue operating the communications payload on the Intelsat 709 satellite (call sign S2396) at the 54.85° E.L. orbital location.<sup>2</sup>

Intelsat 709 is currently operating at 54.85° E.L. pursuant to the International Telecommunication Union (“ITU”) filings of the Indian Administration. The most recent extension of Intelsat’s agreement with the Indian Administration authorizes Intelsat to operate a satellite at this location through June 30, 2011. A copy of that extension was previously filed with the FCC<sup>3</sup> and is incorporated herein by reference.

The purpose of this STA request is to seek continued authority to operate Intelsat 709 at 54.85° E.L. until its planned relocation to the 72.10° E.L. orbital location on May 15, 2011.<sup>4</sup> Prior to the relocation of Intelsat 709, traffic at the 54.85° E.L. orbital location will be transferred to the Intelsat 702 satellite.<sup>5</sup> All information regarding the operation of the Intelsat 709 satellite at 54.85° E.L. had been provided in Intelsat’s prior authorization and is incorporated herein

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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-00770, File No. SAT-STA-20110325-00061 (Apr. 8, 2011) (Public Notice).

<sup>3</sup> See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, Federal Communications Commission, File No. SAT-STA-20110325-00061 (March 29, 2011).

<sup>4</sup> *Request for Special Temporary Authority to Drift and Operate Intelsat 709*, File No. SAT-STA-20110316-00055 (filed Mar. 16, 2011).

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00772, File No. SAT-STA-20110307-00051 (Apr. 15, 2011) (Public Notice).

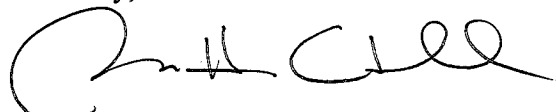
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by reference.<sup>6</sup> Intelsat will continue to comply with all the conditions of its current authorization to operate at the 54.85° E.L. orbital location, and asks that the Part 25 waivers originally granted to the Intelsat 709 spacecraft continue 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.<sup>7</sup>

Grant of this STA extension 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 continue to operate in conformance with the conditions in its current authorization.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Kathryn Medley

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<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00759, File No. SAT-MOD-20091106-00117 (Feb. 18, 2011) (Public Notice).

<sup>7</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 and Order and Authorization), recon. denied, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).