

May 10, 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 Drift and Operate Intelsat 702  
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC (f/k/a Intelsat North America LLC) ("Intelsat") herein requests a 30-day extension – through June 12, 2011, of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to drift Intelsat 702 (call sign S2388) from 66.0° E.L. to 54.85° E.L. and begin operating at 54.85° E.L. in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.<sup>2</sup> At 54.85° E.L., Intelsat 702 will replace Intelsat 709, which Intelsat plans to redeploy to 72.10° E.L.<sup>3</sup>

Intelsat 702 recently arrived on station 54.85° E.L. As noted in the original STA request, Intelsat expects Intelsat 702 to operate at 54.85° E.L. for approximately three months, after which it will be relocated. Following traffic transfer from Intelsat 709 to Intelsat 702, Intelsat 709 will be relocated to 72.10° E.L. as noted above.

Intelsat 702 will continue to operate at 54.85° E.L. in the following frequencies. The specific TT&C frequencies are as follows:

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<sup>1</sup> Intelsat has filed this STA extension 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-00772, File No. SAT-STA-20110307-00051 (Apr. 15, 2011). Intelsat's recent extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. through June 30, 2011. That extension was filed as a supplement to the original STA request and is incorporated herein by reference. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, File No. SAT-STA-20110307-00051 (Mar. 29, 2011).

<sup>3</sup> See *Intelsat License LLC, Application to Modify Authorization for Intelsat 709 (S2396)*, File No. SAT-MOD-20110428-00081 (filed Apr. 28, 2011); see also *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20110316-00055 (filed Mar. 16, 2011).

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Uplink:

6173.7 MHz and 6176.3 MHz (LHCP)

Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)  
3952.5 MHz and 3952.0 MHz (RHCP)

The specific communications payload frequencies are as follows:

Uplink:

5925-6425 MHz  
14.0-14.5 GHz

Downlink:

3700-4200 MHz  
10.95-11.2 GHz  
11.45-11.7 GHz  
12.5-12.75 GHz<sup>4</sup>

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 702 spacecraft continue to apply at the 54.85° 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>5</sup>

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service to customers in the Indian Ocean region for a few more months. Intelsat will ensure that any of its customers at 54.85° E.L.

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<sup>4</sup> Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 54.85° E.L. orbital location.

<sup>5</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).

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whose contracts have not terminated are moved to other satellites before Intelsat 702 leaves the location.

Grant of this STA request will not result in increased risk of harmful interference. At 54.85° E.L., Intelsat will continue to operate the communications payload in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also agrees to operate Intelsat 702 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.<sup>6</sup>

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 709, Intelsat 702 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 Intelsat 702 at 54.85° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 54.85° 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 request.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Karl Kensinger  
Kathryn Medley  
Stephen Duall

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<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).