

May 19, 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 for 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 May 28, 2011 through June 26, 2011, to temporarily operate its New Dawn satellite (call sign S2751) at 32.85° E.L. in the bands 3625-4200 MHz (downlink), 5850-6500 MHz (uplink), 10950-11200 MHz and 11450-11700 MHz (downlink), and 14000-14500 MHz (uplink) during traffic transition and subsequently to drift the satellite to its permanent location of 32.8° E.L.<sup>2</sup> New Dawn currently is undergoing in-orbit testing at 23.1° E.L.<sup>3</sup> but expects to begin drifting to 32.85° E.L. shortly. Intelsat seeks this STA in order to ensure safe station-keeping of New Dawn and Galaxy 11 during traffic transition, as explained more fully below.

New Dawn was launched on April 22, 2011. Shortly thereafter, Intelsat determined that the satellite's west antenna reflector had not successfully deployed. As a result, two of the satellite's thrusters currently are not useable, which has resulted in some uncertainty regarding the satellite's maneuver performance. Accordingly, during traffic transition from Galaxy 11, which currently is located at 32.8° E.L.,<sup>4</sup> Intelsat plans to employ a more conservative separation strategy, including separating the two satellites slightly in longitude to allow for uncertainties in the maneuvers.

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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 32.85° E.L. to 32.8° E.L., the satellite's communications payload will be operated.

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00776, File No. SAT-STA-20110302-00045 (Apr. 29, 2011) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00541, File No. SAT-MOD-20080225-00051 (July 25, 2008) (Public Notice).

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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 while temporarily located at 32.85° E.L. With the exception of Galaxy 11, 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.<sup>5</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 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 Commission may grant a request for STA when there are extraordinary circumstances requiring temporary operations in the public interest.<sup>6</sup> Due to the uncertainty regarding New Dawn's maneuver performance, temporary operation of the satellite at 32.85° E.L. is a critical step in ensuring the safe station-keeping of New Dawn and Galaxy 11 while traffic transition occurs. 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,



Susan H. Crandall  
Assistant General Counsel

Intelsat Corporation

cc: Robert Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall

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<sup>5</sup> Following traffic transition, Galaxy 11 will be relocated to 55.5° W.L. See *Policy Branch Information*, Report No. SAT-00764, File No. SAT-MOD-20101102-00229 (Mar. 11, 2011) (Public Notice).

<sup>6</sup> See 47 C.F.R. § 25.120(b).