

\* GRANT IN PART - DENY IN PART \*

S2388 SAT-STA-20110520-00093 IB2011001449  
Intelsat License LLC  
INTELSAT 702

File # SAT-STA-20110520-00093  
Call Sign S2388 Grant Date 08/05/11  
(or other identifier)  
Term Dates Period of  
From 08/05/11 To: 30 days  
Approved: *Stephen J. Duall*

Approved by OMB  
3060-0678



Date & Time Filed: May 20 2011 2:32:14:383PM  
File Number: SAT-STA-20110520-00093  
Callsign:

*Stephen J. Duall*  
Stephen J. Duall  
Chief, Satellite Policy Branch

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY  
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for Special Temporary Authority for Intelsat 702 (S2388)

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall		

**Attachment**  
**IBFS File No. File No. SAT-STA-20110520-00093**  
**Call Sign S2388**

The request of Intelsat License LLC (Intelsat), IBFS File No. SAT-STA-20110520-00093, as supplemented,<sup>1</sup> is GRANTED in part and DENIED in part.<sup>2</sup> Accordingly, Intelsat is authorized, for a period of 30 days to conduct Telemetry, Tracking, and Telecommand (TT&C) operations with the Intelsat 702 space station (Call Sign S2388) to effect the drift of the Intelsat 702 space station from the 54.85° E.L. orbital location to the 50.0° E.L. orbital location and to operate the space station at that location using the following C-band frequencies: 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (right-hand circular polarization/space-to-Earth); and 6173.7 MHz and 6176.3 MHz (left-hand circular polarization/Earth-to-space). Additionally, Intelsat is authorized to provide Fixed-Satellite Services (FSS) temporarily via the Intelsat 702 space station at 50.0° E.L. in the C-band frequencies of 3700-4200 MHz and 5925-6425 MHz and the Ku-band frequencies of 10.95-11.2 GHz, 11.45-11.7 GHz, 12.5-12.75 GHz, and 14.0-14.5 GHz once Intelsat 702 arrives at the 50.0° E.L. orbital location. These operations are authorized in accordance with the technical specifications set forth in Intelsat's application, the Commission's rules, and the following conditions:

1. All operations shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station.
2. In the event of any harmful interference caused by Intelsat 702's operations during the drift to and operation at the 50.0° E.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
3. During the drift to the 50.0° E.L. orbital location, Intelsat may not operate the communications payload on Intelsat 702.
4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
5. Intelsat shall maintain full operational control of Intelsat 702 at all times.
6. While at the 50.0° E.L. orbital location, Intelsat shall maintain the Intelsat 702 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
7. Intelsat must comply with the applicable laws, regulations, rules and authorization process of any country in which it seeks to provide service.
8. Intelsat's request that the waivers originally granted to the Intelsat 702 spacecraft, 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, 47 C.F.R. §§ 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i),

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<sup>1</sup> See Letter to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, from Susan H. Crandall, Assistant General Counsel, Intelsat Corporation, dated July 13, 2011.

<sup>2</sup> In its application, Intelsat requests special temporary authority for a period of 60 days. We grant special temporary authority for a shorter 30-day period because (1) the STA request was not placed on public notice, and (2) the applicant has not filed a request for regular authority for the service. See 47 C.F.R. § 25.120(b)(3) & (4).

**Attachment**  
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**Call Sign S2388**

and 25.211(a) continue to apply at the 50.0° E.L. location, is granted, as conditioned in that authorization.<sup>3</sup>

9. Intelsat's use of the 10.95-11.2 GHz and the 11.45-11.7 GHz frequency bands is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

10. Pursuant to footnote US342 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, services operating in the 14.47-14.50 GHz band shall take all practicable steps to protect the radio astronomy service from harmful interference.

11. Intelsat shall provide the Commission with all information that may be necessary for submission to the ITU in connection with the operations of Intelsat 702 space station at the 50.0° E.L. orbital location.

12. This authorization is issued on the understanding that Intelsat, pursuant to its agreement with Türksat Satellite Communication Cable TV and Operation Inc., will conform its operations of the Intelsat 702 space station to parameters agreed to in coordination agreements between the Administration of Turkey and other Administrations. As the United States remains the licensing authority, responsibility for both compliance with and enforcing compliance with those agreements is a matter that would arise under private law.

13. This authorization is issued on the understanding that this grant is not an approval of any specific agreement entered into by Intelsat, its subsidiaries, and affiliates, nor of any specific provision of any such agreement, concerning operation of the Intelsat 702 space station, nor is it an approval of an agreement concerning any related matter, nor of any specific provision of any such agreement concerning any related matter.

14. This authorization is issued on the understanding that this grant does not in any way express a view concerning, or agreement as to, the validity or lack of validity of any ITU filing at or within the vicinity of the 50.0° E.L. orbital location.

15. This authorization is also issued on the understanding that the United States remains the licensing administration, for purposes of ITU Radio Regulation 18.1, for the Intelsat 702 space station, and that its operations at 50.0° E.L. are pursuant to ITU Radio Regulation 4.4.

16. Intelsat is afforded thirty days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.


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<sup>3</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).

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17. These actions are issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and are effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

\* GRANT IN PART - DENY IN PART \*

 <b>GRANTED*</b> International Bureau *with conditions	<b>File #</b> <u>SAT-STA-20110520-00093</u>
	<b>Call Sign</b> <u>S2388</u> <b>Grant Date</b> <u>08/05/11</u> (or other identifier)
	<b>Term Dates</b> period of <b>From</b> <u>08/05/11</u> <b>To:</b> <u>30 days</u>
	<b>Approved:</b> <u><i>Stephen J. Duall</i></u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
<b>Name:</b>	Susan H Crandall
<b>Company:</b>	Intelsat Corporation
<b>Street:</b>	3400 International Drive, N.W.
<b>Phone Number:</b>	202-944-7848
<b>Fax Number:</b>	202-944-7870
<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington
<b>State:</b>	DC
<b>Country:</b>	USA
<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall
<b>Relationship:</b>	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CRY – Space Station (Geostationary)	
5. Type Request	
<input checked="" type="radio"/> Change Station Location	<input type="radio"/> Extend Expiration Date <input type="radio"/> Other
6. Temporary Orbit Location 50.0 E.L.	7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests Special Temporary Authority for 60 days commencing July 31, 2011 to drift Intelsat 702 to 50.0 E.L. and operate the satellite at that location for approximately two weeks pursuant to the filings of the Administration of Turkey.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.

Yes  No

10. Name of Person Signing  
Susan H. Crandall

11. Title of Person Signing  
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

May 20, 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 for Intelsat 702  
Call Sign: S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 60 days commencing July 31, 2011 to drift Intelsat 702 to 50.0° E.L. and operate the satellite at that location for approximately two weeks pursuant to the filings of the Administration of Turkey.

Intelsat 702 currently is located at 54.85° E.L.<sup>2</sup> Intelsat expects to begin drifting Intelsat 702 from 54.85° E.L. to 50.0° E.L. on July 31, 2011 and have the satellite on-station at 50.0° E.L. approximately three weeks later. Intelsat expects to operate Intelsat 702 at 50.0° E.L. until approximately mid-September 2011, at which point – subject to receipt of FCC approval -- the satellite will be redeployed to 47.5° E.L., where it will operate until it is de-orbited.<sup>3</sup>

During the drift of Intelsat 702 from 54.85° E.L. to 50.0° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow

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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-00772, File No. SAT-STA-20110307-00051 (Apr. 15, 2011) (Public Notice); *Intelsat License LLC Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 702*, File No. SAT-STA-20110510-00088 (filed May 10, 2011).

<sup>3</sup> Intelsat has filed an application to permanently transfer licensing authority for Intelsat 702 from the United States to Germany. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00771, File No. SAT-T/C-20110324-00059 (Apr. 15, 2011) (Public Notice). Intelsat expects shortly to file an STA request to drift Intelsat 702 from 50.0° E.L. to 47.5° E.L. and operate the satellite at that location until licensing authority has transferred to Germany.



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industry practices for coordinating TT&C transmissions during the relocation process.

The specific TT&C frequencies are as follows:

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)

Once on-station at 50.0° E.L., Intelsat also will operate the satellite's communications payload frequencies. The specific communications payload frequencies are:

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 50.0° 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>

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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 50.0° 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*

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Grant of this STA request will serve the public interest by allowing Intelsat to meet a customer's short-term request for service at 50.0° E.L. In addition, grant of this STA request will not result in an increased risk of harmful interference. As noted above, during the drift of Intelsat 702 from 54.85° E.L. to 50.0° E.L., Intelsat will utilize only the TT&C frequencies listed above and will coordinate the drift with all operators in the drift path. At 50.0° E.L., Intelsat's operation of Intelsat 702 will be consistent with Turkey's coordination agreements regarding the 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. With the exception of Intelsat's Galaxy 26 satellite,<sup>6</sup> 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 50.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 50.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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*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).

<sup>6</sup> Intelsat has requested FCC authority to move Galaxy 26 from 50.75° E.L. to 50.0° E.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00775, File No. SAT-MOD-20110420-00073 (May 6, 2011) (Public Notice); *Intelsat License LLC Request for Temporary Authority*, File No. SAT-STA-20110314-00053 (filed Mar. 14, 2011). Galaxy 26 and Intelsat 702 will occupy the same station-keeping box while both are located at 50.0° E.L.

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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: Bob Nelson  
Stephen Duall  
Kathryn Medley