

June 21, 2011

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



Re: Request for Extension of Special Temporary Authority for New Dawn; Call Sign: S2751

Dear Ms. Dortch:

Intelsat New Dawn Company, Ltd. ("Intelsat") herein requests a 14-day extension – through July 10, 2011 – of the Special Temporary Authority ("STA")¹ previously granted Intelsat 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.² New Dawn currently is located at 32.85° E.L. Intelsat seeks this STA extension 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°

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00783, File No. SAT-STA-20110519-00091 (June 3, 2011) (Public Notice). New Dawn is licensed to permanently operate at 32.8° E.L. 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.

E.L.,³ Intelsat plans to continue to employ a more conservative separation strategy, including separating the two satellites slightly in longitude to allow for uncertainties in the maneuvers. Traffic transition is expected to be completed by early July.

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. Galaxy 11 is scheduled to move on July 2, 2011, pending completion of traffic transition.⁴ 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.⁵ 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.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00541, File No. SAT-MOD-20080225-00051 (July 25, 2008) (Public Notice).

⁴ 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).

⁵ See 47 C.F.R. § 25.120(b).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall