

July 7, 2011

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



Re: Request for Further Extension of Special Temporary Authority to Drift
and Operate Intelsat 702
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a further 30-day extension -- from July 13, 2011 through August 11, 2011 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to operate Intelsat 702 (call sign S2388) at 54.85° E.L. in C-band pursuant to the ITU filings of the Indian Administration.² Intelsat 702 is expected to be relocated from 54.85° E.L. to 50.0° E.L. starting July 31, 2011.³ Intelsat is nevertheless seeking extension of its authority to operate Intelsat 702 at 54.85° W.L. through August 11, 2011 in order to accommodate a possible delay in the start of drift.

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

¹ Intelsat has filed this STA extension request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.
² See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20110607-00103 (filed June 7, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00782, File No. SAT-STA-20110510-00088 (May 27, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00772, File No. SAT-STA-20110307-00051 (Apr. 15, 2011) (Public Notice). Intelsat's recent extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. in C-band through June 30, 2011. That extension was filed as a supplement to the most recent extension 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). Intelsat anticipates receiving agreement for a short term extension from the Indian Administration shortly. Further, given the long standing operations of Intelsat at this orbital location, we anticipate no harmful interference risks.

³ See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20110520-00093 (filed May 20, 2011).

Ms. Marlene H. Dortch

July 7, 2011

Page 2

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

Downlink:

3700-4200 MHz

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.⁴

Grant of this further extension STA request is in the public interest because it will allow Intelsat to ensure continuity of service to C-band customers in the Indian Ocean region for a few more weeks. Intelsat will ensure that any of its customers at 54.85° E.L. whose contracts have not terminated are moved to other satellites before Intelsat 702 leaves the location.

Grant of this further extension STA request will not result in increased risk of harmful interference. At 54.85° E.L., Intelsat will continue to operate the C-band 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

⁴ 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).

Ms. Marlene H. Dortch

July 7, 2011

Page 3

with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.⁵

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. 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 STA further extension request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall
Jay Whaley

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).