

S2388 SAT-STA-20110707-00125 IB2011003439  
Intelsat License LLC  
INTELSAT 702

Date & Time Filed: Jul 7 2011 7:39:19:156PM  
File Number: SAT-STA-20110707-00125  
Callsign:

File # SAT-STA-20110707-00125

Call Sign S2388 Grant Date 06/03/11  
(or other identifier)

Term Dates period of  
From 07/13/11 To: 30 days

Approved:

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

Approved by OMB  
3060-0678



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 Further Extension of Special Temporary Authority for Intelsat 702 (S2388)

1. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	202-944-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	c/o Intelsat Corporation 3400 International Drive, N.W.	<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		

**Attachment to Grant**  
**Application of Intelsat License LLC for Special Temporary Authority**  
**IBFS File No. SAT–STA–201100707–00125**

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–201100707–00125, is granted. Accordingly, Intelsat is authorized for a period of 30 days commencing July 13, 2011 to continue to perform Telemetry, Tracking, and Telecommand (TT&C) operations with the Intelsat 702 space station (Call Sign S2388) necessary to maintain Intelsat 702 at the 54.85° E.L. orbital location using the following center frequencies: 6173.7 MHz and 6176.3 MHz (left-hand circular polarization/Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (right-hand circular polarization/space-to-Earth). Additionally, Intelsat is granted authority to provide Fixed-Satellite Service at the 72.1° E.L. orbital location on a temporary basis using the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz, (space-to-Earth), 12.50-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. This authorization shall be in accordance with the technical specifications set forth in Intelsat's application, Federal Communications Commission (Commission) rules, and the following conditions:

1. All operations of Intelsat 702 during the operation at the 54.85° E.L. orbital location 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 during Intelsat 702's operation at the 54.85° 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. Intelsat's request that the Part 25 technical waivers previously granted for the operations of Intelsat 702, *i.e.* 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), and 25.211(a), continue to apply to the operations of Intelsat 702 at the 54.85° W.L. orbital location is granted. *See Intelsat LLC, Memorandum Opinion and Order*, 15 FCC Rcd 15460 (2000), recon. denied, 15 FCC Rcd 25234 (2000).
4. Intelsat shall maintain full operational control of Intelsat 702 at all times.
5. While at the 54.85° E.L. orbital location, Intelsat shall maintain the Intelsat 702 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
6. This authorization is issued on the understanding that Intelsat, pursuant to its agreement with the Indian Space Research Organization (ISRO), will conform its operations of the Intelsat 702 space station to parameters agreed to in coordination agreements between the Administration of India 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.
7. This authorization is also issued on the understanding that, in regards to filings with the International Telecommunication Union (ITU), the Administration of India is not acting pursuant to Article 9.1 of the Radio Regulation on behalf of the United States administration.

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**IBFS File No. SAT–STA–201100707–00125**

8. 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 54.85° E.L. are pursuant to ITU Radio Regulation 4.4.

9. Intelsat shall prepare and submit to the Federal Communications Commission, within fifteen days following grant of this authorization, the necessary materials for submission to the ITU, pursuant to Article 8.4 of the Radio Regulations, in connection with the operations of the Intelsat 702 space station at the 54.85° E.L. orbital location.

10. 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.

11. 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 54.85° E.L. orbital location.

12. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

13. The EIRP density in the frequency bands 10.95-11.20 GHz, 11.45-11.70 GHz, and 12.50-12.75 GHz from the Intelsat 702 space station shall not exceed -30.1 dBW/Hz in the downlink, and the uplink power spectral density in the frequency band 14.0-14.5 GHz shall not exceed -54.5 dBW/Hz.

14. The EIRP density in the frequency band 3700-4200 MHz from the Intelsat 702 space station shall not exceed -45.0 dBW/Hz in the downlink and the uplink power spectral density in the frequency band 5925–6425 MHz shall not exceed -58.0 dBW/Hz.

15. The operation of the Intelsat 702 space station in the 10.95-11.20 GHz and 11.45-11.70 GHz band is limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

16. Intelsat's use of the 10.95-11.20 GHz and the 11.45-11.70 GHz band 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.

17. Use of the 12.5-12.75 GHz frequency bands is not permitted for Fixed-Satellite Service in the space-to-Earth direction in Region 2.

**Attachment to Grant**  
**Application of Intelsat License LLC for Special Temporary Authority**  
**IBFS File No. SAT-STA-201100707-00125**

18. Intelsat is authorized to operate the communications payload of the Intelsat 702 satellite at the 54.85° E.L orbital location until expiration of its current agreement with ISRO, which has been extended until August 31, 2011. See Supplemental Information Regarding Intelsat License LLC Application for Extension of Special Temporary Authority for Intelsat 702 (Call Sign S2388), IBFS File Nos. SAT-STA-20110607-00103 and SAT-STA-20110707-00125. After this date, Intelsat must either seek authority from the Commission to extend the term of this authorization or cease operating the communications payload of the Intelsat 702 at the 54.85° E.L orbital location. Intelsat may continue to operate the TT&C payload after this date.

19. Intelsat shall either establish sufficient contact with the operator of the Express AM22 space station to ascertain the times, frequencies and types of emissions to be used for the Express AM22's operations, or establish a monitoring function to determine such.

20. In the event that an operator-to-operator arrangement is not reached between Intelsat and the operator of the Express AM22 space station, and if the Express AM22 space station utilizes receive antenna diameters of less than 1.2 meters within a beam which overlaps the coverage area of the Intelsat 702 space station beam, in the 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz frequency bands, then Intelsat shall maintain an EIRP density of no greater than 39.25 dBW/36 MHz in the downlink transponders co-frequency with the Express AM22 transmissions utilizing those antennas.

21. 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.

22. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is 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.



\*with conditions

File # SAT-STA-20110707-00125

Call Sign S2388 Grant Date 08/03/11

(or other identifier)

Term Dates period of

From 07/13/11 To: 30 days

Approved: \_\_\_\_\_

*Stephen J. Duall*  
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>	Relationship: 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 type="radio"/> Change Station Location <input checked="" type="radio"/> Extend Expiration Date <input type="radio"/> Other	
6. Temporary Orbit Location	
54.85 E.L.	7. Requested Extended Expiration Date
	2011-08-11 00:00:00.0

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 a further 30-day extension, from July 13, 2011 through August 11, 2011, of the Special Temporary Authority 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. Intelsat 702 is expected to be relocated from 54.85 E.L. to

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.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**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.**

## **8. Description**

Intelsat License LLC herein requests a further 30-day extension, from July 13, 2011 through August 11, 2011, of the Special Temporary Authority 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. Intelsat 702 is expected to be relocated from 54.85 E.L. to 50.0 E.L starting July 31, 2011.



July 7, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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")<sup>1</sup> 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.<sup>2</sup> Intelsat 702 is expected to be relocated from 54.85° E.L. to 50.0° E.L. starting July 31, 2011.<sup>3</sup> 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:

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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  
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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

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.<sup>4</sup>

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

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<sup>4</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).

Ms. Marlene H. Dortch  
July 7, 2011  
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with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.<sup>5</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. 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

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

July 27, 2011

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



Re: Supplemental Information Regarding Intelsat License LLC  
Application for Extension of Special Temporary Authority for  
Intelsat 702 (Call Sign S2388), File Nos. SAT-STA-20110607-  
00103 and SAT-STA-20110707-00125

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") hereby provides supplemental information relating to Intelsat's above referenced request for extension of Special Temporary Authority to continue operating Intelsat 702 at 54.85° E.L. pursuant to the ITU filings of the Indian Administration. Specifically, Intelsat attaches hereto an extension of its agreement with the Indian Administration, which authorizes Intelsat to operate a satellite at 54.85° E.L. through August 31, 2011.<sup>1</sup>

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<sup>1</sup> The agreement between Intelsat and the Indian Space Research Organization, Department of Space, Government of India, was originally filed under a request for confidential treatment in 2004. *See Further Amendment to Application of Intelsat LLC to Modify Authorization for Intelsat 702*, File No. SAT-AMD-20031118-00331.

Marlene H. Dortch  
July 27, 2011  
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Please direct any questions about this supplement to the undersigned.

Respectfully submitted,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Attachment

cc: Robert Nelson (with attachment)  
Karl Kensinger (with attachment)  
Kathryn Medley (with attachment)  
Stephen Duall (with attachment)  
Jay Whaley (with attachment)

**Amendment 7 (dated 21 July 2011) to the Agreement (dated 6<sup>th</sup> March 2004) and its Amendments between Department of Space, Government of India and INTELSAT LLC regarding placement of an INTELSAT satellite at 54.85 degrees East**

a. Replace 'Term' Paragraph 1 by the following:

'TERM'

The agreement shall be valid until 31 August 2011 only for the usage of C band by Intelsat for the coverage outside of India from the orbital location of 54.85E unless terminated for default or in accordance with this section.

b. All other terms and conditions remain unchanged.

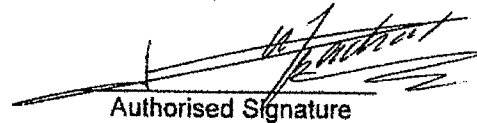
DOS



Authorized Signature  
(N. Neelakantan)  
Director, SCNP, ISRO HQ

Date: 25<sup>th</sup> July 2011

INTELSAT SATELLITE LLC



Authorized Signature

**Flavien Bachabi**  
Deputy Chairman

Date: 27<sup>th</sup> July 2011