

July 15, 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 180 days commencing September 23, 2011 to drift Intelsat 702 from 50.0° E.L. to 47.5° E.L. and, if needed, to operate the satellite at 47.5° E.L. under U.S. authorization pursuant to the filings of the German Administration. Intelsat has filed an application to permanently transfer licensing authority for Intelsat 702 from the United States to Germany.<sup>2</sup> If that application has been granted by the time Intelsat 702 arrives at 47.5° E.L., Intelsat will operate the satellite under German authority at that location.

Intelsat 702 currently is located at 54.85° E.L.<sup>3</sup> Intelsat expects to begin drifting Intelsat 702 from 54.85° E.L. to 50.0° E.L. in mid-August 2011 where it will operate for two weeks.<sup>4</sup> On September 23, 2011, Intelsat expects to commence drifting Intelsat 702 to 47.5° E.L. and expects to have the satellite on-station at that location by early October 2011. At 47.5° E.L., Intelsat 702

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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; Satellite Space Applications Accepted for Filing*, Report No. SAT-00771, File No. SAT-T/C-20110324-00059 (Apr. 15, 2011) (Public Notice).

<sup>3</sup> See *Intelsat License LLC Request for Extension of Special Temporary Authority*, File No. SAT-STA-20110707-00125 (filed July 7, 2011); *Intelsat License LLC Request for Extension of 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).

<sup>4</sup> See *Intelsat License LLC Request for Special Temporary Authority for Intelsat 702*, File No. SAT-STA-20110520-00093 (filed May 20, 2011).

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will replace Intelsat 601, which operates under German authority.<sup>5</sup> Intelsat expects to operate Intelsat 702 at 47.5° E.L. until it is de-orbited.

The entity that holds the authorization to operate at 47.5° E.L. is Europe\*Star Gesellschaft Fur Satellitenkommunikation mbH ("Europe\*Star"), a joint venture that is 51 percent owned by a sister entity of Intelsat -- PanAmSat Europe Corporation ("PanAmSat Europe"). PanAmSat Europe is a Delaware company that is wholly owned by Intelsat Corporation (f/k/a/ PanAmSat Corporation). Certain members of the Shulte-Hillen family and other entities own the remaining 49 percent of Europe\*Star. The German representative of the Schulte-Hillen family is Beatrix von Wietersheim. The director and manager of Europe\*Star is:

Patricia Casey

The officers and directors of PanAmSat Europe are:

Kurt Riegelman  
Patricia Casey  
Robert Cummins – Co-secretary  
Abogado Nominees Limited (B&M London) – Secretary

Intelsat herein incorporates by reference the New Slot Usage Agreement between Europe\*Star and PanAmSat Europe, as well as Europe\*Star's authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC.<sup>6</sup> PanAmSat Europe and Intelsat are among the many Intelsat entities that are parties to various intercompany agreements that allow entities in the Intelsat corporate family generally to provide services to one another.

During the drift of Intelsat 702 from 50.0° E.L. to 47.5° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

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<sup>5</sup> Following traffic transfer to Intelsat 702, Intelsat 601 is expected to be de-orbited.

<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

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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)

Once on-station at 47.5° E.L., Intelsat also will operate the satellite's communications payload frequencies.<sup>7</sup> 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>8</sup>

Grant of this STA request will serve the public interest by ensuring continuity of service to customers at 47.5° E.L. In addition, grant of this STA request will not result in increased risk of harmful interference. As noted above, during the drift of Intelsat 702 from 50.0° E.L. to 47.5° E.L., Intelsat will

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<sup>7</sup> As noted above, should Intelsat's pending transfer of control application be granted prior to Intelsat 702's arrival at 47.5° E.L., the on-station operational authority sought herein will not be required as the satellite will be operated under German authorization. *See supra* n. 2.

<sup>8</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 47.5° E.L. orbital location.

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utilize only the TT&C frequencies listed above and will coordinate the drift with all operators in the drift path. At 47.5° E.L., Intelsat's operation of the Intelsat 702 frequencies will be consistent with Germany'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. Except for Intelsat 601, 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 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 47.5° 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 request.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Stephen Duall  
Kathryn Medley  
Jay Whaley