

S2388 SAT-STA-20110715-00129  
Intelsat License LLC  
Intelsat 702

IB2011003552

File # SAT-STA-20110715-00129

Call Sign S2388 Grant Date 09/22/11  
(or other identifier)

Term Dates period of  
From 09/23/11 To: 180 days

Approved by OMB  
3060-0678

Approved: Stephen J. Drell

Stephen J. Drell  
Chief, Satellite Policy Branch



Date & Time Filed: Jul 15 2011 5:32:04:880PM  
File Number: SAT-STA-20110715-00129  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

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

I. 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 to Grant**  
**IBFS File No. SAT–STA–20110715–00129**  
**Call Sign S2388**

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT–STA–20110715–00129, for special temporary authority is GRANTED. Accordingly, Intelsat is authorized for 180 days commencing September 23, 2011, to operate Telemetry, Tracking, and Telecommand (TT&C) frequencies necessary to drift the Intelsat 702 space station (Call Sign S2388) from the 50.0° E.L. orbital location to the 47.5° E.L. orbital location, and to maintain Intelsat 702 at 47.5° E.L., using the following center frequencies: 6173.7 MHz and 6176.3 MHz (Earth-to-space); 3947.5 MHz; 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (space-to-Earth). Additionally, once Intelsat 702 arrives at the 47.5° E.L. orbital location, it is authorized to operate at that location on a temporary basis using the following frequency bands: 5925-6425 MHz and 14.0-14.5 GHz (Earth-to-space); and 3700-4200 MHz, 10.95-11.2 GHz, 11.45-11.7 GHz and 12.5-12.75 GHz (space-to-Earth). These operations are authorized in accordance with the technical specifications set forth in Intelsat's application, Federal Communications Commission (Commission) rules, and the following conditions:

1. All operations during the drift to or operations at the 47.5° E.L. orbital location shall be on 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 drift to the 47.5° E.L. orbital location or operation at that 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 47.5° E.L. orbital location, Intelsat may not operate Intelsat 702's primary communications payload.
4. Intelsat shall maintain full operational control of Intelsat 702 at all times.
5. While at the 47.5° 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. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
7. 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), and 25.211(a) continue to apply at the 47.5° E.L. location, is granted as conditioned in that authorization.<sup>1</sup>
8. 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.

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<sup>1</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).

**Attachment to Grant**  
**IBFS File No. SAT-STA-20110715-00129**  
**Call Sign S2388**

9. 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 47.5° E.L. orbital location.

10. 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 47.5° E.L. are pursuant to ITU Radio Regulation 4.4.

11. 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.

12. Intelsat's use of the 10.95-11.2 GHz and 11.45-11.7 GHz 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.

13. Intelsat's operation of the Intelsat 702 space station in the 10.95-11.2 GHz and 11.45-11.7 GHz bands 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).

14. 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.

15. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application for the transfer of control of the Intelsat 702 space station to the German Administration to be operated at the 47.5° E.L. orbital location (IBFS File No. SAT-T/C-20110324-00059).

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.

17. This action is issued pursuant to the 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.



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(or other identifier)  
Term Dates period of  
From 09/23/11 To: 180 days  
Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Satellite Policy Branch

<b>2. Contact</b>	
<b>Name:</b> Susan H Crandall	<b>Phone Number:</b> 202-944-7848
<b>Company:</b> Intelsat Corporation	<b>Fax Number:</b> 202-944-7870
<b>Street:</b> 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>	<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 SATT/C2011032400059 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 47.5 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 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

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"; 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).

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## **8. Description**

Intelsat License LLC herein requests Special Temporary Authority 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.

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