July 27, 2011

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



Re: Request for Further Extension of Special Temporary Authority to Operate Intelsat 603 in C- and Ku-band Frequencies at 11.5° E.L.; Call Sign: S2399

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 180-day further extension – from August 2, 2011 through January 28, 2012 -- of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to operate certain C- and Ku-band communications frequencies, along with TT&C carriers, on the Intelsat 603 satellite (call sign S2399) at 11.5° E.L.<sup>2</sup>

Intelsat also has a pending request to re-flag Intelsat 603 from United States licensing to United Kingdom licensing.<sup>3</sup> Until such time as the exchange of licensing administrations can occur, Intelsat seeks a further extension of its current STA to continue operating the C- and Ku-band frequencies on the Intelsat 603 satellite at 11.5° E.L. and TT&C carriers previously authorized.

**Operational Frequencies:** The specific communications frequencies for which Intelsat has authority are:

<sup>3</sup> See Policy Branch Information; Satellite Space Applications Accepted for Filing, Report No. SAT-00671, File No. SAT-T/C-20100112-00008 (Mar. 12, 2010) (Public Notice).

<sup>&</sup>lt;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>&</sup>lt;sup>2</sup> See Policy Branch Information; Actions Taken, Report No. SAT-00715, File No. SAT-STA-20100614-00132 (Aug. 13, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00702, File No. SAT-STA-2020614-00131 (Jun. 25, 2010) (Public Notice).

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> 3700-4200 MHz<sup>4</sup> 5925-6425 MHz<sup>5</sup> 10950-11200 MHz 11450-11700 MHz 14000-14500 MHz

TT&C Frequencies: The specific TT&C frequencies are:

Telecommand frequencies: (LHCP)	6173.7 MHz (LHCP) and 6176.3 MHz
Telemetry frequencies:	3947.5 MHz (RHCP), 3948.0 MHz (RHCP), 3952.0 MHz (RHCP) and 3952.5 MHz (RHCP)

**Geographic Service Area:** The communications frequencies listed here will continue to be received or transmitted through C-band beams that cover Europe, Africa, and small portions of Asia and South America and two Ku-band spot beams that cover east Africa and portions of the Middle East.

**Waivers:** Intelsat requests that the Part 25 waivers originally granted to the Intelsat 603 spacecraft continue to apply at the  $11.5^{\circ}$  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>6</sup>

**Conditions.** Intelsat agrees to accept the following conditions on its use of the 10950-11200 MHz and 11450-11700 MHz frequencies:

<sup>&</sup>lt;sup>4</sup> Intelsat does not seek STA to operate Intelsat 603's 3625-3700 MHz payload.

<sup>&</sup>lt;sup>5</sup> Intelsat does not seek STA to operate Intelsat 603's 5850-5925 MHz payload.

<sup>&</sup>lt;sup>6</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).

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(1) Operations in the 10950-11200 MHz and 11450-11700 MHz frequency bands shall comply with the terms of 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.

(2) Operations in the 10950-11200 MHz and 11450-11700 MHz frequency bands are 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).

Grant of this application will serve the public interest by allowing Intelsat to continue to provide continuity of service on the Intelsat 603 satellite at 11.5° E.L. In addition, grant of this further extension request will provide additional time for the FCC and regulatory agency in the United Kingdom, Ofcom, to reach an understanding on the transfer of licensing responsibility for the Intelsat 603 spacecraft.

Grant of this STA further extension is not expected to cause any harmful interference. Intelsat will continue to operate the C-band frequencies at levels low enough to ensure the protection of the W2A satellite operated by Eutelsat, which is the only C-band satellite within 5° of 11.5° E.L. Intelsat 603's Ku-band beams are pointed and will continue to be operated in such a way that they have significant spatial and/or polarization isolation with respect to the operation of Eutelsat satellites at 10° E.L. and 13° E.L. Moreover, Intelsat agrees to continue operating the frequencies identified above on a non-interference, non-protected basis and in the unlikely circumstance that interference is generated to any other satellite, Intelsat agrees to immediately cease transmissions until the interference concerns of the interfered-with operator are satisfactorily resolved.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA further extension request to continue operating certain C- and Ku-band frequencies on Intelsat 603 at  $11.5^{\circ}$  E.L.

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Sincerely,

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Susan H. Crandall Assistant General Counsel Intelsat Corporation

cc: Bob Nelson Karl Kensinger Kathyrn Medley Stephen Duall Jay Whaley