

August 5, 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 10-day extension -- from August 12, 2011 through August 21, 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 was expected to be relocated from 54.85° E.L. to 50.0° E.L. starting July 31, 2011,<sup>3</sup> but in order to accommodate a delay in the start of drift, Intelsat is seeking extension of its authority to operate Intelsat 702 at 54.85° W.L. through August 21, 2011.<sup>4</sup>

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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. 20110707-00125 (filed Jul. 7, 2011); *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 August 31, 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 Nos. SAT-STA-20110607-00103 and SAT-STA-20110707-00125 (Jul. 27, 2011).

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

<sup>4</sup> Intelsat currently expects to begin drifting Intelsat 702 on August 15, 2011.

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

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>5</sup>

Grant of this further extension STA request is in the public interest because it will allow Intelsat to accommodate the delayed start-of-drift date for Intelsat 702. As previously noted, 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.

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<sup>5</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).

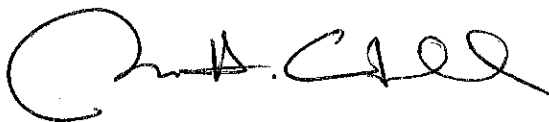
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Grant of this further extension STA request will not result in increased risk of harmful interference. At 54.85° E.L., Intelsat will continue to operate the C-band communications payload in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also agrees to operate Intelsat 702 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.<sup>6</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,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Karl Kensinger  
Kathryn Medley  
Stephen Duall  
Jay Whaley

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<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).