

August 10, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Special Temporary Authority to Drift and Operate
Intelsat 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing upon grant, to drift Intelsat 706 (call sign S2401) from 72.10° E.L. to 72.0° E.L. and to continue operating at 72.0° E.L. in the C- and Ku-bands. Intelsat currently expects to operate Intelsat 706 at 72.0° E.L. only for two to three months before redeploying the satellite to a new location. Intelsat expects shortly to file an application seeking authority for that relocation. In the meantime, however, for the reasons set forth below, Intelsat seeks to operate Intelsat 706 at 72.0° E.L. rather than 72.10° E.L.

Intelsat 706 is currently operating at 72.10° E.L.² Following receipt of FCC approval, Intelsat 706 will be relocated to 72.0° E.L. During the drift of Intelsat 706 from 72.10° E.L. to 72.0° E.L., Intelsat will operate both the satellite's TT&C and communications frequencies.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00768, File No. SAT-MOD-20100511-00098 (Mar. 25, 2011) (Public Notice).

The communications frequencies are as follows:

3700 – 4200 MHz (space-to-Earth)
5925 – 6425 MHz (Earth-to-space)
10950 – 11200 MHz (space-to-Earth)
11450 – 11700 MHz (space-to-Earth)
12500 – 12750 MHz (space-to-Earth)
14000 – 14500 MHz (Earth-to-space)

Grant of this STA request is in the public interest because it will allow Intelsat to begin drifting Intelsat 706 and operating the satellite at 72.0° E.L. as quickly as possible. This will allow Intelsat to better ensure safe station-keeping of the Intelsat 706 satellite – which currently is co-located with the Intelsat 709 satellite at 72.10° E.L.³ – following the former satellite’s recent commencement of inclined orbit operations.⁴

Grant of this STA request will not result in increased risk of harmful interference. Intelsat had been operating Intelsat 706 and Intelsat 709 in the same station-keeping box without interference. Moreover, at 72.0° E.L., Intelsat will continue to operate the communications payload in conformance with Intelsat’s coordination agreements related to that 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. Intelsat 706 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 706 at 72.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 72.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

³ See *Policy Branch Information; Actions Taken*, Report No. 00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

⁴ See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

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Intelsat understands and accepts that the conditions applied to the operation of Intelsat 706 at 72.1° E.L. will continue to apply at 72.0° E.L.⁵

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley

⁵ See *supra* n. 2.