

August 31, 2011

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



Re: Request for Extension of Special Temporary Authority for
Intelsat 702
Call Sign: S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day extension -- from September 4, 2011 through October 3, 2011 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 702 to 50.0° E.L. and operate the satellite at that location for approximately two weeks pursuant to the filings of the Administration of Turkey.²

Intelsat 702 currently is currently drifting from 54.85° E.L. to 50.0° E.L. and Intelsat expects to have the satellite on-station at 50.0° E.L. on September 10, 2011. Intelsat expects to operate Intelsat 702 at 50.0° E.L. until approximately September 23, 2011, at which point -- subject to receipt of FCC approval -- the satellite will be redeployed to 47.5° E.L.,³ where it will operate until it is de-orbited.⁴

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-00800; File No. SAT-STA-20110520-00093 (Aug. 12, 2011) (Public Notice).

³ Intelsat has a pending request for Special Temporary Authority to drift Intelsat 702 from 50.0° E.L. to 47.5° E.L. and to operate the satellite temporarily at 47.5° E.L. if the satellite re-flagging process has not been completed. *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00801, File No. SAT-STA-20110715-00129 (Aug. 19, 2011) (Public Notice). See *infra* n.4.

⁴ Intelsat has filed an application to permanently transfer licensing authority for Intelsat 702 from the United States to Germany. 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).

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During the drift of Intelsat 702 from 54.85° E.L. to 50.0° E.L., Intelsat will continue to 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:

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 50.0° E.L., Intelsat also will operate the satellite's communications payload frequencies. 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 GHz⁵

⁵ 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 50.0° E.L. orbital location.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 702 spacecraft continue to apply at the 50.0° 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.⁶

Grant of this STA extension request will serve the public interest by allowing Intelsat to meet a customer's short-term request for service at 50.0° E.L. In addition, grant of this STA extension request will not result in an increased risk of harmful interference. As noted above, during the drift of Intelsat 702 from 54.85° E.L. to 50.0° E.L., Intelsat will utilize only the TT&C frequencies listed above and will coordinate the drift with all operators in the drift path. At 50.0° E.L., Intelsat's operation of Intelsat 702 will be consistent with Turkey'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. With the exception of Intelsat's Galaxy 26 satellite,⁷ 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 50.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with

⁶ 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).

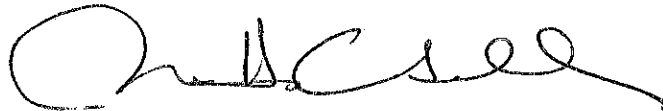
⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00800, File No. SAT-STA-20110727-00137 (Aug. 12, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00787, File No. SAT-STA-20110314-00053 (Jun. 17, 2011). See also *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00775, File No. SAT-MOD-20110420-00073 (May 6, 2011) (Public Notice). Galaxy 26 and Intelsat 702 will occupy the same station-keeping box while both are located at 50.0° E.L.

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Intelsat 702 at 50.0° 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 extension request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and a long horizontal stroke at the end.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Kathryn Medley
Stephen Duall
Jay Whaley