

September 15, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554



Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 18; Call Sign: S2817

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days, from October 14, 2011 through November 12, 2011, to conduct in-orbit testing ("IOT") of Intelsat 18 (call sign S2817) at 176.0° E.L. in the bands 3700-4200 MHz (downlink), 5925-6425 MHz (uplink), 10950-11200 MHz, 11450-11700 MHz, and 12250-12750 MHz (downlink), and 14000-14500 MHz (uplink) and to drift the satellite to its permanent location of 180.0° E.L.<sup>2</sup> Intelsat 18 currently is scheduled to be launched on October 4, 2011. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 18, Intelsat will operate in the above referenced C- and Ku-bands. Intelsat currently is in the process of coordinating the planned in-orbit testing of Intelsat 18 with all operators of satellites operating co-frequency up to six degrees away from 176.0° E.L. Specifically, Intelsat is coordinating the proposed testing with Inmarsat, the operator of the Inmarsat 3 F-3 satellite at 178.0° E.L. and with GE Holdings, the operator of the GE 23 satellite at 172.0° E.L. Intelsat will internally coordinate the proposed testing with its own Intelsat 701 satellite at 180.0° E.L. and Intelsat 602 satellite at 177.85° E.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 during in-orbit testing at 176.0° E.L. Intelsat 18 will not be

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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; Actions Taken*, Report No. SAT-00796, File No. SAT-LOA-20101014-00219 (July 29, 2011) (Public Notice). During the drift from 176.0° E.L. to 180.0° E.L., only the satellite's TT&C frequencies will be utilized.

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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 18. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 18 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 18 at 176.0° E.L. is a critical step in ensuring that the satellite will be fully operational at 180.0° E.L. This, in turn, will ensure continuity of service to customers at the 180.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Robert Nelson  
Kathryn Medley  
Stephen Duall  
Jay Whaley