

September 15, 2011

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



Re: Request for Special Temporary Authority for Galaxy 12
Call Sign: S2422

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)¹ for 30 days commencing October 20, 2011 to drift Galaxy 12 from 133.0° W.L. to 132.90° W.L. and operate the satellite at that location for approximately two months.²

Galaxy 12 currently is located at 133.0° W.L.³ With FCC approval, Intelsat expects to begin drifting Galaxy 15 (call sign S2387) from 133.10° W.L. to 133.0° W.L. on October 1, 2011 and have that satellite on-station at 133.0° W.L. approximately two to three weeks later.⁴ The Galaxy 12 and Galaxy 15 satellites will be temporarily co-located at 133.0° W.L. and traffic will be transferred from Galaxy 12 to Galaxy 15. Subject to FCC approval, Galaxy 12 will then drift to 132.90° W.L., where it will operate as an in-orbit spare until mid-December 2011. Thereafter, and subject to receipt of FCC approval, Galaxy 12 will be relocated to 129° W.L.⁵

During the drift of Galaxy 12 from 133.0° W.L. to 132.90° W.L. and while operating at 132.90° W.L., Intelsat will utilize only the satellite’s TT&C frequencies and will follow industry practices for coordinating TT&C

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² Intelsat will file a request for extension of this STA as necessary.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File Nos. SAT-MOD-20100120-00013 and SAT-AMD-20100514-00102 (Oct. 22, 2010) (Public Notice).

⁴ See Intelsat License LLC, Request for Special Temporary Authority to Drift Galaxy 15, File No. SAT-STA-20110915-00181 (filed Sept. 15, 2011).

⁵ Intelsat expects to relocate Galaxy 12 to 129° W.L. in mid-December 2011.

Ms. Marlene H. Dortch

September 15, 2011

Page 2

transmissions during the relocation process.⁶ The specific TT&C frequencies are as follows:

Uplink:

6424.5 MHz (V)

6425.5 MHz (RHCP)

Downlink:

4198.0 MHz (H)

4199.875 MHz (H)

4198.0 MHz (LHCP)

4199.875 MHz (LHCP)

Intelsat requests that the waiver of Section 25.283(c) of the Commission's rules continues to apply at the 132.90° W.L. orbital location.⁷

Grant of this STA request will serve the public interest by facilitating safe station-keeping at the nominal 133.0° W.L. orbital location. Moreover, grant of this STA will enable Intelsat to ensure all customer demands are satisfied at the nominal 133.0° W.L. location.

Grant of this STA request will not result in an increased risk of harmful interference. As noted above, during the drift of Galaxy 12 from 133.0° W.L. to 132.90° W.L. and while operating at 132.90° W.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. Moreover, at 132.90° W.L., Intelsat will continue to operate the TT&C frequencies 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. Galaxy 12 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 Galaxy 12 at 132.90° W.L. Finally, Intelsat is not aware of any system with an overlapping station-

⁶ Intelsat will seek all necessary authority if the Galaxy 12 satellite is needed to provide service using the satellite's communications frequencies at the 132.90° W.L. orbital location.

⁷ 47 C.F.R. § 25.283(c). *See supra* note 3.

Ms. Marlene H. Dortch

September 15, 2011

Page 3

keeping volume with Galaxy 12 at 132.90° W.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 request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley