

October 10, 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 706  
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30-day extension -- from October 17, 2011 through November 15, 2011 -- of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to drift Intelsat 706 (call sign S2401) from 72.10° E.L. to 72.0° E.L. and to operate at 72.0° E.L. in the C- and Ku-bands.<sup>2</sup> Intelsat currently expects to operate Intelsat 706 at 72.0° E.L. until early December 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 continue operating Intelsat 706 at 72.0° E.L. in the frequencies below.

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)

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

<sup>2</sup> See File No. SAT-STA-20110912-00177 (stamp grant issued by Stephen J. Duall on Oct. 6, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00802, File No. SAT-STA-20110810-00159 (Aug. 19, 2011) (Public Notice).

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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 further extension request is in the public interest because it will allow Intelsat to continue operating Intelsat 706 at 72.0° E.L. This will allow Intelsat to continue to ensure safe station-keeping of the Intelsat 706 satellite vis-à-vis the Intelsat 709 satellite at 72.10° E.L.<sup>3</sup> following the former satellite's recent commencement of inclined orbit operations.<sup>4</sup>

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate the communications payload in conformance with Intelsat's coordination agreements related to the 72.0° E.L. 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.

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.<sup>5</sup>

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

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

<sup>5</sup> See *supra* n. 2.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Crandall". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley