

October 21, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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")<sup>1</sup> for 180 days, commencing December 1, 2011, to drift Intelsat 706 (call sign S2401) from 72.0° E.L. to 47.5° E.L. and to operate at 47.5° E.L. in the C- and Ku-bands in inclined orbit.<sup>2</sup> Intelsat currently expects to operate Intelsat 706 at 47.5° E.L. until the satellite is de-orbited in the fourth quarter of 2012. At 47.5° E.L., Intelsat will operate Intelsat 706 pursuant to the ITU filings of the German administration.<sup>3</sup>

Intelsat 706 is currently operating at 72.0° E.L.<sup>4</sup> Intelsat 709 satellite (call sign S2396) will continue to operate at 72.1° E.L.,<sup>5</sup> and Intelsat has recently filed an

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

<sup>2</sup> Intelsat 706 began operating in inclined orbit mode earlier this year. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

<sup>3</sup> Intelsat incorporates herein by reference the description of Europe\*Star Gesellschaft Fur Satellitenkommunikation mbH ("Europe\*Star"), the entity that holds the authorization to operate at 47.5° E.L., set forth on page 2 of its STA request, File No. SAT-STA-20110715-00129. Intelsat further incorporates by reference the New Slot Usage Agreement between Europe\*Star and PanAmSat Europe, as well as Europe\*Star's authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC. *See Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

<sup>4</sup> *See* File No. SAT-STA-20111010-00196 (stamp grant issued by Stephen J. Duall on Oct. 18, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00813, File No. SAT-STA-20110912-00177 (Oct. 7, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00802, File No. SAT-STA-20110810-00159 (Aug. 19, 2011) (Public Notice).

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application to launch and operate the Intelsat 22 satellite (call sign S2846) at 72.1° E.L.<sup>6</sup> Following receipt of FCC approval, Intelsat 706 will be relocated to 47.5° E.L. It is expected to be on-station at that location in February 2012. During the drift of Intelsat 706 from 72.0° E.L. to 47.5° E.L., Intelsat will operate only the satellite's TT&C frequencies and will coordinate the drift with potentially affected operators.

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)

The specific 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 ensure continuity of service at the nominal 47.5° E.L. location. As described more fully below, Intelsat 706 will replace the two Intelsat satellites currently at the nominal 47.5° E.L. location.

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<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

<sup>6</sup> Intelsat License LLC, Application for Authority to Launch and Operate Intelsat 22, a Replacement Satellite With New Frequencies, at 72.1° E.L., File No. SAT-LOA-20110929-00193 (filed Sept. 29, 2011).

Grant of this STA request will not result in increased risk of harmful interference. Intelsat has been operating Intelsat 601 at 47.5° E.L. under German authorization since 2007.<sup>7</sup> Intelsat 601 currently is being de-orbited. Intelsat also operates Intelsat 702 at 47.5° E.L.<sup>8</sup> without interference. The traffic from Intelsat 601 has been transferred to Intelsat 702. Once Intelsat 706 arrives, the traffic on Intelsat 702 will be transferred to Intelsat 706 and Intelsat 702 likely will be redeployed. Intelsat will operate Intelsat 706 at 47.5° E.L. in conformance with Germany'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. Except for Intelsat 702, 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 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 47.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 706 spacecraft continue to apply at the 47.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.<sup>9</sup>

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<sup>7</sup> See Intelsat North America LLC, Application for Special Temporary Authority Concerning the Relocation of Intelsat 601 to the 47.5° W.L. Orbital Location, Order, 22 FCC Rcd 19258 (2007).

<sup>8</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00810, File No. SAT-STA-20110715-00129 (Sept. 23, 2011) (Public Notice).

<sup>9</sup> 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).

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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". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley