November 7, 2011

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat
        701
        Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority
("STA")[1] for 30 days, commencing November 24, 2011, to drift Intelsat 701
(call sign S2400) from 180.0° E.L. to 157.0º E.L. and to operate at 157.0º E.L.
in the C- and Ku-bands. Intelsat seeks expedited treatment of this STA request
for the reasons set forth below.

Intelsat 701 is currently operating at 180.0º E.L.[2] Following receipt of FCC
approval, Intelsat 701 will be relocated to 157.0º E.L. It is expected to be on-
station at that location in mid-December 2011 and is expected to operate there
until it is de-orbited in 2018.[3] During the drift of Intelsat 701 from 180.0º E.L.
to 157.0º 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 MHz (LHCP)
        6176.3 MHz (LHCP)

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[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] *See Applications of Intelsat LLC for Authority to Operate, and to Further
Construct, Launch, and Operate C-band and Ku-band Satellites that Form a
Global Communications System in Geostationary Orbit*, Memorandum
Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), recon. denied,
15 FCC Rcd 25234 (2000).
[3] Intelsat will file shortly a modification application seeking permanent
authority for this redeployment.

Downlink:

3947.5 MHz (RHCP)
3948.0 MHz (RHCP)
3952.5 MHz (RHCP)
3952.0 MHz (RHCP)

The communications frequencies are as follows:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
10950 – 11200 MHz
11450 – 11700 MHz
11700 – 11950 MHz
12500 – 12750 GHz

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service to a customer in the region that cannot tolerate the degree of inclination of the satellite it currently operates on. Once Intelsat 701 is relocated to 157.0° E.L., the customer will be transferred from its current satellite to Intelsat 701. In addition, grant is in the public interest because it will allow Intelsat to meet additional customer demand at this location.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Intelsat 701 at 157.0° E.L. in accordance with Intelsat's coordination agreements related to 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. Intelsat 701 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
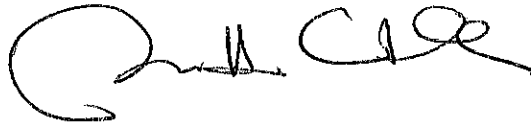
Intelsat 701 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 157.0° E.L. location, namely, the waivers of Sections 25.140(b)(2), 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.[4]

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

Sincerely,

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
        Jay Whaley

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[4] *See supra* n.2.