

November 14, 2011

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



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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day extension – through December 18, 2011 of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat 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.<sup>2</sup>

Galaxy 12 currently is located at 132.90° W.L. following traffic transfer from Galaxy 12 to Galaxy 15. At 132.90° W.L., Galaxy 12 will continue to operate as an in-orbit spare until December 2011. Thereafter, and subject to receipt of FCC approval, Galaxy 12 will be relocated to 129.0° W.L.<sup>3</sup>

While operating Galaxy 12 at 132.90° W.L., Intelsat will continue to utilize the following TT&C frequencies:

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)

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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> See *Policy Branch Information; Actions Taken*, Report No. SAT-00816, File No. SAT-STA-20110915-00183 (Oct. 21, 2011) (Public Notice).

<sup>3</sup> Intelsat expects to relocate Galaxy 12 to 129.0° W.L. in mid-December 2011. See *Application of Intelsat License LLC to Modify Galaxy 12 License*, File No. SAT-MOD-20111011-00197 (filed Oct. 11, 2011).

To the extent necessary, Intelsat will operate the following communications frequencies on Galaxy 12 at 132.90° W.L.:

Uplink:

5925-6425 MHz

Downlink:

3700-4200 MHz

Intelsat agrees to the continued application of the conditions set forth in the original STA grant.<sup>4</sup> In addition, Intelsat requests that the waiver of Section 25.283(c) of the Commission's rules previously granted to Galaxy 12 continue to apply at the 132.90° W.L. orbital location.<sup>5</sup>

Grant of this STA extension 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 extension will enable Intelsat to ensure all customer demands are satisfied at the nominal 133.0° W.L. location.

Grant of this STA extension request will not result in an increased risk of harmful interference. As noted above, while operating Galaxy 12 at 132.90° W.L., Intelsat will continue to utilize only the satellite's TT&C frequencies and will operate in those 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-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 toward launch.

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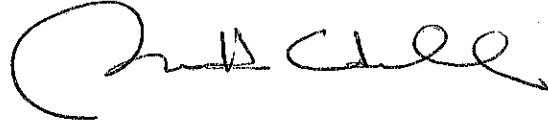
<sup>4</sup> See *supra* n.2.

<sup>5</sup> 47 C.F.R. § 25.283(c). 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).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is written in a cursive style with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley