

November 14, 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 23, 2011, to drift Intelsat 701 (call sign S2400) from 180.0° E.L. to 72.1° E.L. and to operate at 72.1° 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 180.0° E.L.² Following receipt of FCC approval, Intelsat 701 will be relocated to 72.1° E.L. to provide capacity to customers, including a U.S. Government customer, currently on Intelsat 709 in the event of a launch delay of Intelsat 22. Intelsat 701 is expected to be on-station at 72.1° E.L. in early April 2012 and is expected to operate there until Intelsat 22 commences service, after which it will be redeployed.³ During the drift of Intelsat 701 from 180.0° E.L. to 72.1° 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:

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 22 currently is expected to launch in the first quarter of 2012. See *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).

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

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 customers, including a U.S. Government customer, currently on Intelsat 709 that will not be able to tolerate the degree of inclination of that satellite should the Intelsat 22 launch be delayed. Should there be a launch delay, these customers will be transferred from Intelsat 709 to Intelsat 701 until Intelsat 22 is available.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Intelsat 701 at 72.10° 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. Except for Intelsat 709, Intelsat 701 will not be located at the

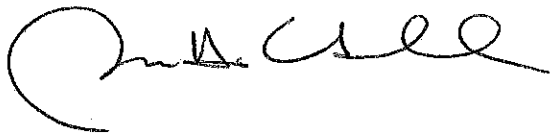
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same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 701 at 72.1° E.L. Finally, except for Intelsat 709, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 72.1° 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 72.1° 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

⁴ See *supra* n.2.