

December 13, 2011

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



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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing December 20, 2011, to stop the drift of Intelsat 701 (call sign S2400) and operate the satellite at 157.0° E.L. in the C- and Ku-bands in inclined orbit mode. Intelsat 701 currently is drifting from 180.0° E.L. to 72.1° E.L.², but for the reasons set forth below, Intelsat seeks to relocate the satellite instead to 157.0° E.L.

As explained in the initial STA request, Intelsat 701 was to be relocated to 72.1° E.L. to provide capacity to customers currently on Intelsat 709 in the event of a launch delay of Intelsat 22.³ However, Intelsat very recently has determined that Intelsat 709 has more fuel remaining than previously assumed, thus eliminating the need for Intelsat 701 at 72.1° E.L. Accordingly, Intelsat plans to stop Intelsat 701 at 157.0° E.L. starting December 20, 2011.⁴ Intelsat expects to operate Intelsat 701 at 157.0° E.L. until its planned end of life,

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 *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20111114-00218 (filed Nov. 14, 2011) (stamp grant issued by Stephen Duall on Nov. 22, 2011).

³ See *id.* 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).

⁴ Intelsat last month had sought authorization to move Intelsat 701 to 157.0° E.L., but withdrew that request after determining that Intelsat 709's fuel situation required that Intelsat 701 be placed temporarily at 72.1° E.L. See File No. SAT-STA-20111107-00213 (withdrawn on Nov. 14, 2011).

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which currently is expected to be January 2033, assuming continued inclined orbit operations.⁵

The specific TT&C frequencies that will be utilized on Intelsat 701 are as follows:

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 that will be utilized on Intelsat 701 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 that cannot tolerate the degree of inclination of the satellite it currently operates on. This customer will be transferred from its current satellite to Intelsat 701 at 157.0° E.L. In addition,

⁵ See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2400 (Dec. 1, 2011). Intelsat shortly will file a request to operate Intelsat 701 at 157.0° E.L. on a permanent basis.

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.⁶

⁶ *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).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously 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
Kathryn Medley