

S2400 SAT-STA-20111213-00238 IB2011005098  
Intelsat License LLC  
Intelsat 701

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Callsign:

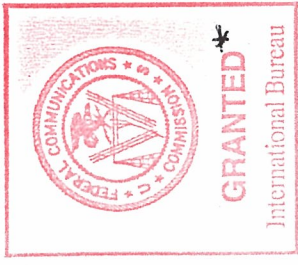
File # SAT-STA-20111213-00238

Call Sign S2400 Grant Date 12/19/11  
(or other identifier)

Term Dates period of  
From 12/20/11 To: 30 days

Approved by OMB  
3060-0678

Approved: *Stephen J. Duall*  
Stephen J. Duall  
Chief, Satellite Policy Branch



FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for Special Temporary Authority to Stop Drift and Operate Intelsat 701, Call Sign S2400

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall		

**Attachment to Grant**  
**IBFS File No. SAT–STA–20111213–00238**  
**Call Sign S2400**

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–20111213–00238, is granted. Accordingly, Intelsat is authorized, for a period of 30 days commencing on December 20, 2011, to conduct Telemetry, Tracking, and Command (TT&C) operations with the Intelsat 701 space station (Call Sign 2400) necessary to stop the drift of Intelsat 701 at the 157.0° E.L. orbital position and to maintain the space station in inclined orbit mode, using the following frequencies: 6173.7 MHz and 6176.3 MHz (left-hand circular polarization/Earth-to-space), and 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (right-hand circular polarization/space-to-Earth).<sup>1</sup> Additionally, Intelsat is authorized to operate Intelsat 701 to provide fixed-satellite service (FSS) at the 157.0° E.L. orbital position in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. This authorization shall be in accordance with the technical specifications set forth in Intelsat’s application, Federal Communication Commission (Commission) rules, and the following conditions:

1. All operations of Intelsat 701 at the 157.0 E.L. orbital location shall be on an unprotected and non-harmful interference basis, *i.e.*, the Intelsat 701 space station shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
2. Intelsat shall maintain full operational control of the Intelsat space station at all times.
3. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat’s own risk.
4. While at the 157.0° E.L. orbital location, Intelsat shall maintain the Intelsat space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
5. Intelsat shall operate Intelsat 701 at the 157.0° E.L. orbital location in accordance with any existing coordination agreements for this location..
6. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

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<sup>1</sup> Intelsat 701 is currently drifting from the 180.0° E.L. orbital position to the 72.1° E.L. orbital position pursuant to an earlier grant of special temporary authority (STA) for a 30-day period. *See* Policy Branch Information; Actions Taken, Report No. SAT-00826; IBFS File No. SAT-STA-20111114-00218 (Rel. Dec. 2, 2011). In that application, Intelsat also requested authority to provide FSS services via Intelsat 701 in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands at the completion of Intelsat 701’s drift to the 72.1° E.L. orbital location. Because Intelsat 701 would not arrive at 72.1° E.L. until early April of 2012, its request for authority to provide FSS at 72.1° E.L. was outside the term of the proposed 30-day STA grant and was thus denied without prejudice to re-filing as part of a future application. On December 2, 2011, Intelsat filed a request for special temporary authority to provide FSS via Intelsat 701 at the 72.1° E.L. orbital location in the frequencies above for a period of 180 days commencing April 1, 2012. (SAT–STA–20111202–00231). Intelsat withdrew this application on December 14, 2011. *See* Policy Branch Information; Actions Taken, Report No. SAT-00829; IBFS File No. SAT–STA–20111202–00231 (Rel. Dec. 16, 2011).

**Attachment to Grant**  
**IBFS File No. SAT-STA-20111213-00238**  
**Call Sign S2400**

7. Intelsat's use of the 10.95-11.2 GHz and 11.45-11.7 GHz bands is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

8. Intelsat's operation of the Intelsat 701 space station in the 10.95-11.2 GHz and 11.45-11.7 GHz bands is limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

9. Use of the 12.5-12.75 GHz frequency bands is not permitted for Fixed-Satellite Service in the space-to-Earth direction in Region 2.


10. Pursuant to footnote US342 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, services operating in the 14.47-14.50 GHz band shall take all practicable steps to protect the radio astronomy service from harmful interference.

11. Intelsat's request that the Part 25 waivers originally granted to the Intelsat 701 space station continue to apply at the 157.0° E.L. orbital location, is granted. *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).

12. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

13. As of the date of this authorization, Intelsat's 30-day STA to drift the Intelsat 701 space station from the 180.0° E.L. orbital position to the 72.1° E.L. orbital position is terminated.<sup>2</sup>

14. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.

 <b>GRANTED*</b> International Bureau * with conditions	File # <u>SAT-STA-2011213-00238</u>
	Call Sign <u>S2400</u> Grant Date <u>12/19/11</u> (or other identifier)
	Term Dates period of From <u>12/20/11</u> To: <u>30 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

<sup>2</sup> See Policy Branch Information: Actions Taken, Report No. SAT-00826; IBFS File No. SAT-STA-20111114-00218 (rel. Dec. 2, 2011).

<b>2. Contact</b>			
<b>Name:</b>	Susan H Crandall	<b>Phone Number:</b>	202-944-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H Crandall	<b>Relationship:</b>	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)			
3. Reference File Number or Submission ID			
4a. Is a fee submitted with this application?			
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).			
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee			
<input type="radio"/> Other (please explain):			
4b. Fee Classification <input type="radio"/> CRF – Space Station (Geostationary)			
5. Type Request			
<input checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> Other			
6. Temporary Orbit Location			7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests Special Temporary Authority 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.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes  No

10. Name of Person Signing  
Susan H. Crandall

11. Title of Person Signing  
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).**

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

December 13, 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 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")<sup>1</sup> 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.<sup>2</sup>, 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.<sup>3</sup> 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.<sup>4</sup> Intelsat expects to operate Intelsat 701 at 157.0° E.L. until its planned end of life,

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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 *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).

<sup>3</sup> 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).

<sup>4</sup> 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).

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

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,

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<sup>5</sup> 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.



Ms. Marlene H. Dortch  
December 13, 2011  
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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.<sup>6</sup>

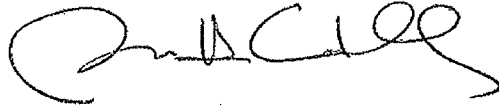
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<sup>6</sup> See *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), *recon. denied*, 15 FCC Rcd 25234 (2000).

Ms. Marlene H. Dortch  
December 13, 2011  
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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