

December 27, 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 Drift and Operate  
Galaxy 12  
Call Sign S2422

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 30-day extension -- through January 28, 2012 -- of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Galaxy 12 (call sign S2422) from 132.9° W.L. to 129.0° W.L. and begin operating at 129.0° W.L.<sup>2</sup> Intelsat has a pending application for permanent authority to redeploy Galaxy 12 to 129.0° W.L., where it will operate in the C-band.<sup>3</sup>

Galaxy 12 is currently drifting to 129.0° W.L. and Intelsat expects to have the satellite on-station at 129.0° W.L. by the end of December. During the drift of Galaxy 12 from 132.9° W.L. to 129.0° W.L., Intelsat will continue to utilize only the satellite’s TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process.

The specific TT&C frequencies are as follows:

Uplink:  
6424.5 MHz (RHCP), (H)

Downlink:  
4198 MHz (LHCP), (V)  
4199.875 MHz (LHCP), (V)

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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-00826, File No. SAT-STA-20111118-00223 (Dec. 2, 2011) (Public Notice).

<sup>3</sup> See Policy Branch Information; Satellite Space Applications Accepted for Filing, Report No. SAT-00824, File No. SAT-MOD-20111011-00197 (Nov. 18, 2011) (Public Notice).

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The specific communications frequencies are as follows:

3700-4200 MHz (space-to-Earth)

5925-6425 MHz (Earth-to-space)

Intelsat requests that the waiver of Section 25.283(c) of the Commission's rules continues to apply at the 129.0° W.L. orbital location.<sup>4</sup>

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue drifting Galaxy 12 and operating the satellite at 129.0° W.L. while the Commission completes its consideration of the pending application for permanent authority. In addition, grant will ensure that the 129.0° W.L. location is occupied as quickly as possible following the recent return of Galaxy 15 to full commercial operation at 133.0° W.L.<sup>5</sup> Intelsat understands and accepts that a grant of this STA extension request would not prejudice the Commission's determination of Intelsat's request to operate Galaxy 12 at 129.0° W.L. on a permanent basis, and that operation pursuant to this STA is at Intelsat's risk.

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will continue to operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 129.0° W.L., Intelsat will operate the communications payload in conformance with its 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. 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 129.0° W.L. Finally, Intelsat is not

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<sup>4</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).

<sup>5</sup> *See* Status Update for Galaxy 15 Satellite, Call Sign S2387, File Nos. SAT-LOA-19991207-00119, SAT-AMD-20040603-00111, SAT-AMD-20031103-00320, SAT-AMD-20030818-00156, SAT-AMD-20021029-00199, SAT-STA-20110915-00181 (filed Nov. 3, 2011).

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aware of any system with an overlapping station-keeping volume with Galaxy 12 at 129.0° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley