

December 30, 2011

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



Re: Request for 180-day Special Temporary Authority to Operate
Intelsat 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 180-day grant of Special Temporary Authority (“STA”) to operate Intelsat 706 (call sign S2401) at 72.0° E.L. in the C- and Ku-bands.¹ The Intelsat 706 satellite is currently operating at 72.0° E.L. pursuant to a series of 30-day STA grants.² Intelsat files this 180-day STA request because it currently expects to operate Intelsat 706 at 72.0° E.L. through early May 2012, after which the satellite will be deployed to a different orbital location. The proposed extension will permit Intelsat to continue operating Intelsat 706 at 72.0° E.L. in the frequencies below until the satellite is redeployed.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00829, File No. SAT-STA-20111209-00237 (Dec. 16, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00826, File No. SAT-STA-20111107-00214 (Dec. 2, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00816, File No. SAT-STA-20111010-00196 (Oct. 21, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00813, File No. SAT-STA-20110912-00177 (Oct. 7, 2011) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00802, File No. SAT-STA-20110810-00159 (Aug. 19, 2011) (Public Notice).

Ms. Marlene H. Dortch

December 30, 2011

Page 2

Downlink:

3947.5 (RHCP)

3948.0 (RHCP)

3952.5 (RHCP)

3952.0 (RHCP)

The communications frequencies are as follows:

3700 – 4200 MHz (space-to-Earth)

5925 – 6425 MHz (Earth-to-space)

10950 – 11200 MHz (space-to-Earth)

11450 – 11700 MHz (space-to-Earth)

12500 – 12750 MHz (space-to-Earth)

14000 – 14500 MHz (Earth-to-space)

Grant of this STA request is in the public interest because it will allow Intelsat to continue operating Intelsat 706 at 72.0° E.L. until the satellite's planned redeployment in early May 2012. This will allow Intelsat to continue to ensure safe E/W station-keeping of the Intelsat 706 satellite vis-à-vis the Intelsat 709 satellite at 72.10° E.L.³ following the former satellite's commencement of inclined orbit operations.⁴

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate the Intelsat 706 communications payload in conformance with Intelsat's coordination agreements related to the 72.0° E.L. 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 706 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 706 at 72.0° E.L.

³ See *Policy Branch Information; Actions Taken*, Report No. 00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

⁴ See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

Ms. Marlene H. Dortch
December 30, 2011
Page 3

Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 72.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch. Intelsat understands and accepts that the conditions applied to the operation of Intelsat 706 at 72.1° E.L. will continue to apply at 72.0° E.L.⁵

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley

⁵ See *supra* n. 2.