

February 9, 2012

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



Re: Request for Further Extension of Special Temporary Authority  
to Stop Drift and Operate Intelsat 701  
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day extension – through March 18, 2012 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat 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.<sup>2</sup>

Intelsat 701 is currently operating at 157.0° E.L. Intelsat expects to operate the satellite at that location until its planned end of life, which currently is expected to be January 2033,<sup>3</sup> assuming continued inclined orbit operations.<sup>4</sup>

Intelsat will continue to utilize the following TT&C frequencies on Intelsat 701 at 157.0° E.L.:

Uplink:

6173.7 MHz (LHCP)  
6176.3 MHz (LHCP)

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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-00842, File No. SAT-STA-20120113-00006 (Feb. 3, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00831, File No. SAT-STA-20111213-00238 (Dec. 23, 2011) (Public Notice).

<sup>3</sup> Intelsat will file shortly a modification application seeking permanent authority to operate Intelsat 701 at this location.

<sup>4</sup> See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2400 (Dec. 1, 2011).

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Downlink:

3947.5 MHz (RHCP)  
3948.0 MHz (RHCP)  
3952.5 MHz (RHCP)  
3952.0 MHz (RHCP)

Intelsat will continue to utilize the following communications frequencies on Intelsat 701 at 157.0° E.L.:

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 further extension request is in the public interest because it will allow Intelsat to continue 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, grant is in the public interest because it will continue to allow Intelsat to meet additional customer demand at this location.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to 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

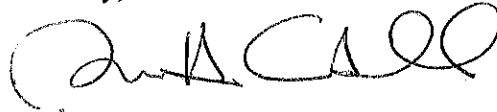
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other operational space stations. Intelsat 701 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of 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>5</sup>

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Kathryn Medley

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<sup>5</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).