

February 21, 2012

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



Re: Request for Special Temporary Authority to Operate the India
Beam on Horizons 2 at 84.85° E.L.; Call Sign: S2423
EXPEDITED TREATMENT REQUESTED

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)¹ for 30 days, commencing immediately upon grant, to begin operating the India beam on Horizons 2 from the satellite’s current location of 84.85° E.L.² to conduct short-term tests on behalf of a potential customer. Intelsat’s current authorization for Horizons 2 at this location does not include authority to operate the India beam because Intelsat did not request such authority. Because the timing of this testing is critical to the potential customer for the reasons described below, Intelsat is requesting expedited treatment of this request.

Intelsat has been in discussions with a potential customer whose services currently are located on a neighboring satellite that has lost the ability to operate 50 percent of its payload. The potential customer has become increasingly concerned about continuity of its service and has requested that it be allowed to test its service on the India beam of Horizons 2. Specifically, the potential customer needs to arrange for qualified uplink and numerous downlink measurements in geographically dispersed locations. Because there is a limited window in which the potential customer can amass the technical teams required to conduct these tests, it wishes to begin testing as soon as possible. The potential customer has informed Intelsat that it has received approval from its regulator to transmit to Horizons 2.

The proposed testing is expected to last no longer than 30 days. If the testing is successful, Intelsat and the potential customer expect to move forward to secure a commercial agreement and Intelsat will seek permanent authority to operate the India beam on Horizons 2.

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-MOD-20110928-00190 (Feb. 3, 2012) (Public Notice).

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During the testing proposed herein, Intelsat will operate in the following communications frequencies, which are already licensed for other beam coverages:

Downlink: 11700-12200 MHz

Uplink: 14000-14500 MHz

In the India beam, the uplink power density of the digital carriers operating in the 14000 – 14500 MHz band will not exceed -47.5 dBW/Hz. In the 11700 – 12200 MHz band, the downlink EIRP density of the digital carriers will not exceed -20 dBW/Hz. Intelsat attaches herewith at Attachments A and B the India beam coverages. Intelsat incorporates by reference the technical information and orbital debris statement submitted in Intelsat's application to modify the Horizons 2 license to allow operation of the satellite at 84.85° E.L.³

Grant of this STA request will not result in risk of harmful interference. Intelsat's proposed operations will be in conformance with its coordination agreements for the 84.85° E.L. orbital location. In the band 14.0-14.5 GHz, the closest operational satellite is KazSat-2 at 86.5° E.L. Intelsat has completed coordination with the operator of this satellite. Moreover, Intelsat has completed coordination with all operators using this band within nine degrees of 84.85° E.L. In the band 11.7-12.2 GHz, the closest operational satellite is Chinasat-9 at 92.2° E.L. The coordination with the operator of this satellite has not been conducted because the ITU filing under which Intelsat will be operating (USABSS-29) did not trigger coordination with the co-frequency filings at 92.2° E.L.

Grant of this STA request will serve the public interest by allowing Intelsat to conduct tests in the Horizon 2 satellite's India beam for a potential customer whose service continuity is threatened in the near term. The proposed testing could result in the potential customer moving to Horizons 2 in the near future in order to maintain service continuity.

³ *See id.*

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

Sincerely,

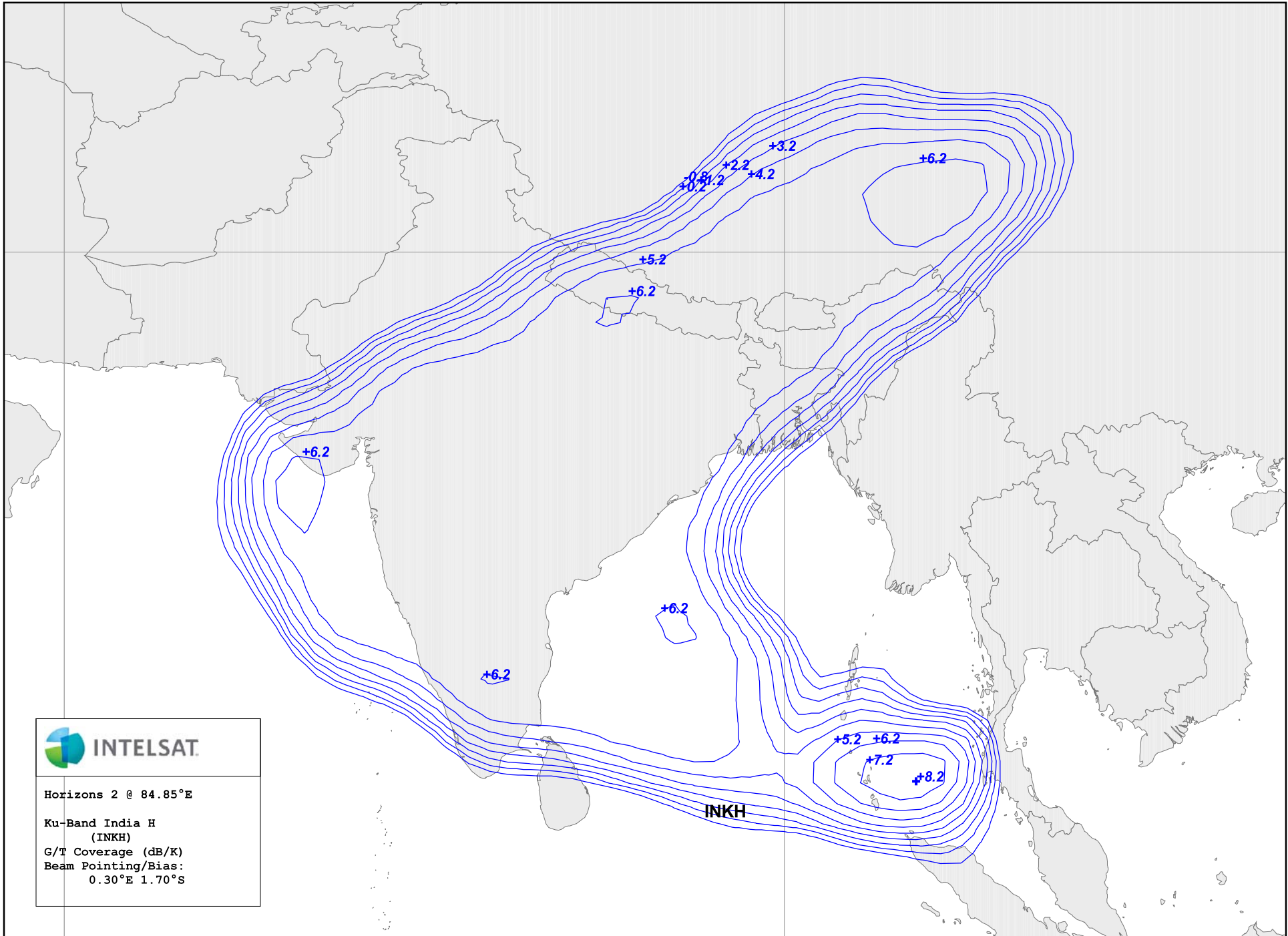
/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Attachments

cc: Robert Nelson
Stephen Duall
Jay Whaley
Kathryn Medley

ATTACHMENT A

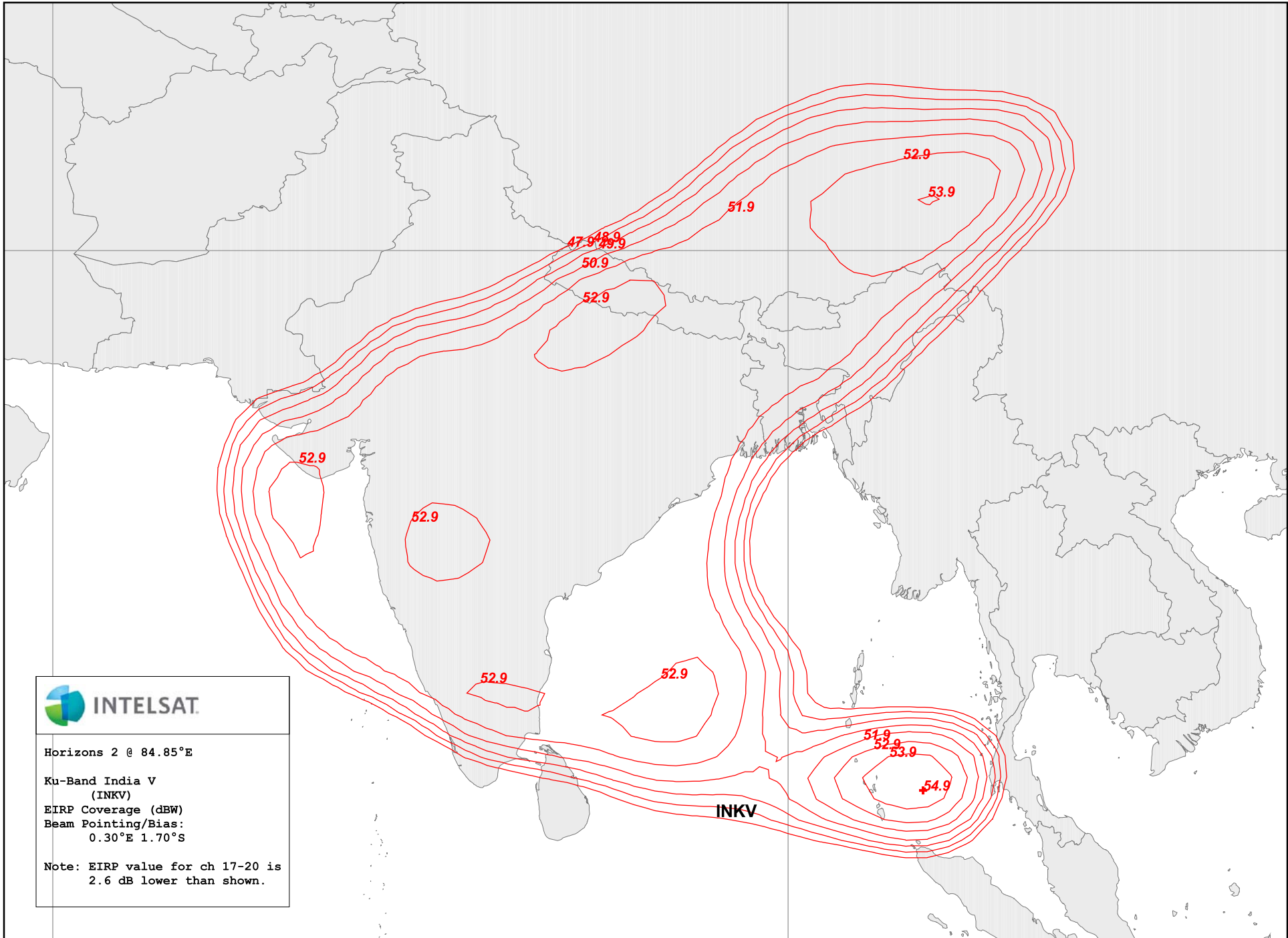


Horizons 2 @ 84.85°E

Ku-Band India H
(INKH)

G/T Coverage (dB/K)
Beam Pointing/Bias:
0.30°E 1.70°S

ATTACHMENT B



Horizons 2 @ 84.85°E

Ku-Band India V
(INKV)

EIRP Coverage (dBW)
Beam Pointing/Bias:
0.30°E 1.70°S

Note: EIRP value for ch 17-20 is
2.6 dB lower than shown.