

March 6, 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 Conduct In-Orbit Testing
of Intelsat 19 (File No. SAT-RPL-20111222-00245)
Call Sign S2850

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from June 1, 2012 through June 30, 2012, to conduct in-orbit testing ("IOT") of Intelsat 19 (File No. SAT-LOA-20111222-00245) at 176.0° E.L. in the bands 3700-4200 MHz (downlink), 5925-6425 MHz (uplink), 12250-12750 MHz (downlink), and 14000-14500 MHz (uplink), and to drift the satellite to its permanent location of 166.0° E.L.² Intelsat 19 currently is scheduled to be launched on May 20, 2012. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 19, Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat's knowledge, the co-frequency satellites within plus/minus six degrees of 176.0° E.L. are GE-23 at 172.0° E.L., Inmarsat 3-F3 at 178.0° E.L., Intelsat 18 at 180.0° E.L., and Intelsat 602 at 177.85° E.L. Intelsat currently is in coordination discussions with GE Satellite and Inmarsat, Ltd., the operators, respectively, of GE-23 and Inmarsat 3-F3. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00843, File No. SAT-RPL-20111222-00245 (Feb. 10, 2012) (Public Notice). During the drift from 176.0° E.L. to 166.0° E.L., only the satellite's TT&C frequencies will be utilized.

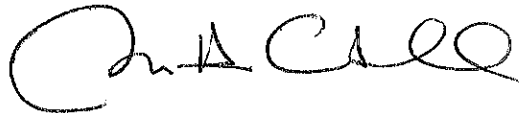
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space stations during in-orbit testing at 176.0° E.L. Intelsat 19 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat 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 19. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 19 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 19 at 176.0° E.L. is a critical step in ensuring that the satellite will be fully operational at 166.0° E.L. This, in turn, will ensure continuity of service to customers at the 166.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall
Assistant General Counsel

Intelsat Corporation

Cc: Robert Nelson
Karl Kensinger
Kathyrn Medley
Stephen Duall
Jay Whaley