

March 23, 2012

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



Re: Request for Special Temporary Authority to Drift Intelsat 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing April 15, 2012, to drift Intelsat 706 (call sign S2401) from 72.0° E.L. to 177.9° E.L., where it will eventually operate in the C- and Ku-bands in inclined orbit.² Intelsat currently expects to operate Intelsat 706 at 177.9° E.L. until the satellite is de-orbited in the fourth quarter of 2013.

Intelsat 706 is currently operating at 72.0° E.L.³ Following receipt of FCC approval, Intelsat 706 will begin drifting to 177.9° E.L. on April 15, 2012. It is expected to be on-station at that location in December 2012.⁴ During the drift of Intelsat 706 from 72.0° E.L. to 177.9° E.L., Intelsat will operate only the

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 Intelsat 706 began operating in inclined orbit mode last year. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

³ *See Policy Branch Information; Actions Taken*, Report No. SAT-00846, File No. SAT-STA-20111230-00253 (Feb. 17, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-STA-20120209-00002 (Feb. 3, 2012) (Public Notice); *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).

⁴ Intelsat will seek operational authority for Intelsat 706 at 177.9° E.L. in advance of the satellite's arrival at the location.

satellite's TT&C frequencies and will coordinate the drift with potentially affected operators.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

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

Grant of this STA request is in the public interest because it will allow Intelsat to flexibly manage its fleet in order to optimize service to customers.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will coordinate the drift with all potentially affected operators. Moreover, Intelsat currently operates Intelsat 602 at 178.0° E.L. without interference.⁵ Intelsat will operate Intelsat 706 at 177.9° E.L. in conformance with its coordination agreements related to the nominal 178.0° 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 177.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 177.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00545, File No. SAT-MOD-20080512-00102 (Aug. 8, 2008) (Public Notice).

Ms. Marlene H. Dortch
March 23, 2012
Page 3

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 706 spacecraft continue to apply at the 177.9° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.⁶

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Stephen Duall
Jay Whaley

⁶ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).