

March 29, 2012



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

Re: Request for Special Temporary Authority for Intelsat 702
Call Sign: S2388

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)¹ for 180 days to continue to operate the Intelsat 702 satellite (call sign S2388) at 47.5° E.L. under U.S. authorization pursuant to the filings of the German Administration.

Intelsat 702 currently is located at 47.5° E.L.² Intelsat originally expected to operate Intelsat 702 at 47.5° E.L. until it is de-orbited. However, due to changes in Intelsat’s deployment plan, Intelsat now expects to redeploy the satellite to a different location in the August 2012 time frame.³

At 47.5° E.L, Intelsat will continue to utilize the following TT&C frequencies:

Uplink:
6173.7 MHz and 6176.3 MHz (LHCP)

Downlink:
3947.5 MHz and 3948.0 MHz (RHCP)
3952.5 MHz and 3952.0 MHz (RHCP)

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-00810, File No. SAT-STA-20110715-00129 (Sep. 13, 2011) (Public Notice). On March 15, 2012, Intelsat filed a request for a 30-day extension to continue operating at the 47.5° E.L. location. See *Request for Special Temporary Authority for Intelsat 702, Call Sign: S2388*, File No. SAT-STA-20120315-00046 (filed Mar. 15, 2012).

³ Intelsat withdrew its application to transfer licensing authority for Intelsat 702 from the United States to Germany. See *Policy Branch Information; Actions Taken*, Report No. SAT-00763, File No. SAT-STA-20101203-00255 (Mar. 4, 2011) (Public Notice).

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Intelsat will continue to utilize the following communications payload frequencies:

Uplink:

5925-6425 MHz

14.0-14.5 GHz

Downlink:

3700-4200 MHz

10.95-11.2 GHz

11.45-11.7 GHz

12.5-12.75 GHz⁴

Grant of this STA extension request will serve the public interest by ensuring continuity of service to customers at 47.5° E.L. In addition, grant of this STA extension request will not result in increased risk of harmful interference. At 47.5° E.L., Intelsat's operation of the Intelsat 702 frequencies will continue to be consistent with Germany's coordination agreements regarding 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 other operational space stations. Intelsat 702 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 702 at 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 47.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁴ Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 47.5° E.L. orbital location.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan H. Crandall', with a large, stylized initial 'S'.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Stephen Duall
Kathryn Medley
Jay Whaley