

S2396 SAT-STA-20120409-00066 IB2012001002
Intelsat License LLC
Intelsat 709



File # SAT-STA-20120409-00066

Call Sign S2396 Grant Date 05/16/12

(or other identifier)

Term Dates period of

From 05/16/12

To: 30 days

Approved:

Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Apr 9 2012 4:24:36:260PM
File Number: SAT-STA-20120409-00066
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for STA to Drift Intelsat 709 to 47.5 E.L. (Call Sign S2396)


1. Applicant

| | | | |
|-------------------|--|----------------------|-----------------------------|
| Name: | Intelsat License LLC | Phone Number: | 202-944-7848 |
| DBA Name: | | Fax Number: | 202-944-7870 |
| Street: | c/o Intelsat Corporation 3400 International Drive, N.W. | E-Mail: | susan.crandall@intelsat.com |
| City: | Washington | State: | DC |
| Country: | USA | Zipcode: | 20008 -3006 |
| Attention: | Susan H. Crandall | | |

Attachment
IBFS File No. SAT-STA-20120409-00066
Call Sign S2396

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-STA-20120409-00066, as supplemented, is granted. Accordingly, Intelsat is authorized for a period of 30 days, commencing May 16, 2012, to operate Telemetry, Tracking, and Telecommand (TT&C) operations with the Intelsat 709 space station (Call Sign S2396) necessary to drift the space station from the 72.1° E.L. orbital location to the 47.5° E.L. orbital location using the following frequencies: 6173.7 MHz and 6176.3 MHz (left-hand circular polarization/Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (right-hand circular polarization/space-to-Earth)¹. This authorization shall be in accordance with the technical specifications set forth in Intelsat's application, Federal Communications Commission (Commission) rules, and the following conditions:

1. All operations of Intelsat 709 during the drift to 47.5° E.L. orbital location shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station.
2. In the event of any harmful interference during Intelsat 709's drift to the 47.5° E.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
3. During the drift to the 47.5° W.L. orbital location, Intelsat may not operate the communications payload on the Intelsat 709 space station.
4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
5. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.

| | |
|---|--|
|  GRANTED * International Bureau *with conditions | File # <u>SAT-STA-20120409-00066</u> |
| | Call Sign <u>S2396</u> Grant Date <u>05/16/12</u> (or other identifier) |
| | Term Dates period of From <u>05/16/12</u> To: <u>30 days</u> |
| | Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch |

¹ Intelsat's request indicates that it will apply for operational authority for maintain Intelsat 709 at 47.5° E.L. in a separate application.

| | |
|---|--|
| 2. Contact | |
| Name: Susan H. Crandall | Phone Number: 202-944-7848 |
| Company: Intelsat Corporation | Fax Number: 202-944-7870 |
| Street: 3400 International Drive, N.W. | E-Mail: susan.crandall@intelsat.com |
| City: Washington | State: DC |
| Country: USA | Zipcode: 20008 -3006 |
| Attention: Susan H. Crandall | Relationship: Legal Counsel |
| (If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.) | |
| 3. Reference File Number or Submission ID | |
| 4a. Is a fee submitted with this application? | |
| <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). | |
| <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee | |
| <input type="radio"/> Other (please explain): | |
| 4b. Fee Classification CRY – Space Station (Geostationary) | |
| 5. Type Request | |
| <input checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> Other | |
| 6. Temporary Orbit Location | 7. Requested Extended Expiration Date |

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests Special Temporary Authority for 30 days beginning May 19, 2012 to drift Intelsat 709 (call sign S2396) from 72.1 E.L. to 47.5 E.L. At 47.5 E. L., Intelsat 709 will operate in inclined orbit mode pursuant to the ITU filings of the German Administration.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

April 9, 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 709
Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days beginning May 19, 2012 to drift Intelsat 709 (call sign S2396) from 72.1° E.L. to 47.5° E.L. At 47.5° E.L., Intelsat 709 will operate in inclined orbit mode pursuant to the ITU filings of the German Administration.²

Intelsat 709 currently is authorized to operate at 72.1° E.L.³ Following traffic transfer from Intelsat 709 to Intelsat 22 (call sign S2846), Intelsat 709 will be relocated to 47.5° E.L. Intelsat 709 is being redeployed to 47.5° E.L. in order to provide continuity of service to customers at that location because Intelsat 702, which currently operates at 47.5° E.L.,⁴ is scheduled to be redeployed later this year. Subject to receipt of FCC approval, Intelsat expects to begin

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 will shortly file an application to modify the Intelsat 709 license to allow the satellite's permanent redeployment to 47.5° E.L. Intelsat incorporates herein by reference the description of Europe*Star Gesellschaft Fur Satellitenkommunikation mbH ("Europe*Star"), the entity that holds the authorization to operate at 47.5° E.L., set forth on page 2 of its STA request, File No. SAT-STA-20110715-00129. Intelsat further incorporates by reference the New Slot Usage Agreement between Europe*Star and PanAmSat Europe, as well as Europe*Star's authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC. See *Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice)

⁴ See Request for Special Temporary Authority for Intelsat 702, Call Sign: S2388, File No. SAT-STA-20120315-00046 (stamp grant issued by Stephen J. Duall on Mar. 30, 2012); *Policy Branch Information; Actions Taken*, Report

Ms. Marlene H. Dortch
April 9, 2012
Page 2

drifting Intelsat 709 on May 19, 2012 and have the satellite on-station at 47.5° E.L. in mid-October 2012.

During the drift of Intelsat 709 from 72.1° E.L. to 47.5° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

Downlink:

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

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service at the 47.5° E.L. location.⁵ As noted above, Intelsat plans later this year to redeploy Intelsat 702, which currently operates at 47.5° E.L.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

No. SAT-00810, File No. SAT-STA-20110715-00129 (Sep. 13, 2011) (Public Notice).

⁵ As noted above, all customers operating on Intelsat 709 at 72.1° E.L. at the time of the planned redeployment to 47.5° E.L. will be accommodated on Intelsat 22 prior to the satellite's drift.

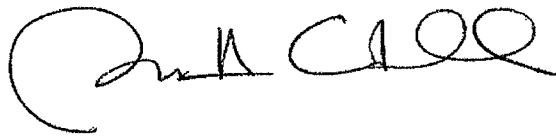
Ms. Marlene H. Dortch
April 9, 2012
Page 3

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. Except briefly for Intelsat 702, Intelsat 709 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.⁶ 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 709 at 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 at 47.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the Part 25 waivers originally granted to the Intelsat 709 spacecraft continue to apply at the 47.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i) and 25.211(a) of the Commission's rules.⁷

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: Stephen Duall
Jay Whaley

⁶ Intelsat 709 and Intelsat 702 will be operated in the same station-keeping box until Intelsat 702 is redeployed.

⁷ 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 Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

April 16, 2012

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



Re: Supplement to Request for Special Temporary Authority to
Drift Intelsat 709
Call Sign S2396; File No. SAT-STA-20120409-00066

Dear Ms. Dortch:

At the request of the International Bureau staff, Intelsat License LLC ("Intelsat") herein supplements its above referenced request for Special Temporary Authority ("STA") to drift Intelsat 709 (call sign S2396) from 72.1° E.L. to 47.5° E.L. As noted in the STA request, at 47.5° E.L., Intelsat 709 will operate in inclined orbit mode pursuant to the ITU filings of the German Administration.¹ Intelsat intends shortly to file an application for permanent modification of the Intelsat 709 license, in which Intelsat will specify the communications frequencies that it will operate on the satellite once it arrives at 47.5° E.L.

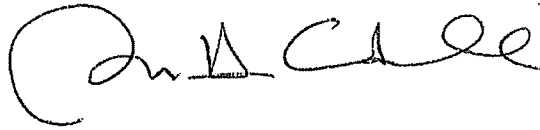
Also as noted in the STA request, Intelsat 709 is expected to be on-station at 47.5° E.L. in mid-October 2012. Currently, Intelsat expects to operate the satellite at that location until it is de-orbited. The current expected end-of-life of Intelsat 709, assuming the drift commences as scheduled, is March 31, 2013.

¹ Intelsat expects to conduct the satellite's last north/south station-keeping maneuver in the next few weeks. Intelsat will file, as required, a notice of commencement of inclined orbit operations within 30 days of the last north/south station-keeping maneuver.

Ms. Marlene H. Dortch
April 16, 2012
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is written in a cursive style with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Kathryn Medley
Stephen Duall
Jay Whaley

May 10, 2012

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



Re: Further Supplement to Request for Special Temporary Authority to
Drift Intelsat 709
Call Sign S2396; File No. SAT-STA-20120409-00066

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein further supplements its above referenced request for Special Temporary Authority ("STA") to drift Intelsat 709 (call sign S2396) from 72.1° E.L. to 47.5° E.L. Specifically, Intelsat herein is requesting that the STA term begin on May 16, 2012 instead of the originally requested start date of May 19, 2012.

As the Commission is aware, Intelsat 22 is replacing Intelsat 709 at 72.1° E.L. Intelsat has recently completed traffic transfer from Intelsat 709 to Intelsat 22 earlier than originally anticipated. Accordingly, Intelsat would like to begin drifting Intelsat 709 to 47.5° E.L. earlier – on May 16, 2012 – in order to minimize the time both satellites are located in the same station-keeping box.

For the reasons set forth in the STA request and this further supplement, Intelsat respectfully requests that the Commission expeditiously grant the STA request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley