

April 16, 2012



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

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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30-day extension – from April 20, 2012 through May 19, 2012 -- of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to drift Intelsat 702 from 50.0° E.L. to 47.5° E.L. and operate the satellite at 47.5° E.L. under U.S. authorization pursuant to the filings of the German Administration.<sup>2</sup>

Intelsat 702 currently is located at 47.5° E.L. 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 next few months.<sup>3</sup> Intelsat has a pending 180-day STA request to continue operating Intelsat 702 at 47.5° E.L. during the time period until that redeployment.<sup>4</sup>

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

Uplink:

6173.7 MHz and 6176.3 MHz (LHCP)

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

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00857, File No. SAT-STA-2012 (Apr. 6, 2012); See *Policy Branch Information; Actions Taken*, Report No. SAT-00810, File No. SAT-STA-20110715-00129 (Sep. 13, 2011) (Public Notice).

<sup>3</sup> 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).

<sup>4</sup> *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00858, File No. SAT-STA-20120329-00063 (Apr. 6, 2012) (Public Notice).

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Downlink:

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

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 GHz<sup>5</sup>

Grant of this STA further 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

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<sup>5</sup> 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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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.

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

Sincerely,

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

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Stephen Duall  
Kathryn Medley  
Jay Whaley