April 23, 2012

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

Re: Request for Extension of Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 22 (File No. SAT-LOA-20110929-00193)
Call Sign S2846

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day extension – from May 1, 2012 through May 30, 2012 – of the Special Temporary Authority ("STA")[1] previously granted Intelsat to continue in-orbit testing ("IOT") of Intelsat 22 (File No. SAT-LOA-20110929-00193) at 63.1º E.L. in the bands 3625-4200 MHz (downlink), 5850-6425 MHz (uplink), 11450-11700 MHz (downlink), 14000-14500 MHz (uplink), and 12250-12750 MHz (downlink).[2] Intelsat 22 was launched on March 25, 2012 and recently commenced in-orbit testing.[3] In support of its extension request, Intelsat submits the following information.

The Intelsat 22 IOT operations will continue to be performed in the above referenced C- and Ku-bands.[4] To Intelsat's knowledge, the only co-frequency satellites within plus/minus six degrees of 63.1º E.L. are Intelsat 904 at 60.0º E.L., Intelsat 902 at 62.0º E.L., Intelsat 906 at 64.15º E.L., Intelsat 17 at 66.0º E.L., Intelsat 7 at 68.65º E.L., Intelsat 10 at 68.5º E.L., and Inmarsat 3F-1 at 64.5º E.L. Intelsat has coordinated the Intelsat 22 IOT with Inmarsat. With

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[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] *See Policy Branch Information; Actions Taken,* Report No. SAT-00856, File No. SAT-STA-20120126-00013 (Mar. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken,* Report No. SAT-00835, File No. SAT-LOA-20110929-00193 (Jan. 13, 2012) (Public Notice). During the drift from 63.1º E.L. to 72.1º E.L., only the satellite's TT&C frequencies will continue to be utilized.

[3] *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, File No. SAT-STA-20120126-00013 (April 17, 2012).

[4] The UHF frequencies on Intelsat 22 will be in-orbit tested at the 72.1º E.L. location pursuant to authority from the Australian administration. Coordination of the in-orbit testing of the UHF payload has been coordinated with the U.S. Department of Defense.

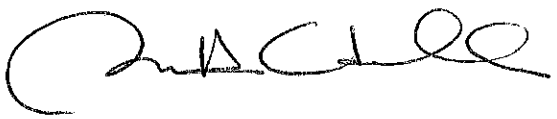
regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 space stations during in-orbit testing at 63.1° E.L. Intelsat 22 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 22. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 22 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The continued in-orbit testing of Intelsat 22 at 63.1° E.L. is a critical step in ensuring that the satellite will be fully operational at 72.1° E.L. This, in turn, will ensure continuity of service to customers at the nominal 72.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel

Intelsat Corporation

Cc: Robert Nelson
Karl Kensinger
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Jay Whaley