

April 26, 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 180 days, commencing upon grant, to drift Intelsat 709 (call sign S2396) from 72.1° E.L. to 47.5° E.L.² At 47.5° E.L., Intelsat 709 will operate in inclined orbit mode pursuant to the ITU filings of the German Administration.³

Intelsat 709 currently is authorized to operate at 72.1° E.L.⁴ 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

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 has a pending 30-day STA request to begin this drift. *See Intelsat License LLC Request for Special Temporary Authority to Drift Intelsat 709*, File No. SAT-STA-20120409-00066 (filed Apr. 9, 2012).

³ 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.).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

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702, which currently operates at 47.5° E.L.,⁵ is scheduled to be redeployed later this year. Subject to receipt of FCC approval, Intelsat expects to begin 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.⁶ 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

⁵ 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 No. SAT-00810, File No. SAT-STA-20110715-00129 (Sep. 13, 2011) (Public Notice). Intelsat has pending applications to continue operating Intelsat 702 at 47.5° E.L. pending the arrival of Intelsat 709. See Request for Special Temporary Authority for Intelsat 702, File No. SAT-STA-20120329-00063 (filed Mar. 29, 2012) and Request for Extension of Special Temporary Authority for Intelsat 702, File No. SAT-STA-20120416-00068 (filed Apr. 16, 2012).

⁶ 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.

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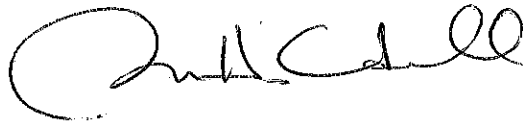
operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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. 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.⁷ 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.⁸

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

⁷ Intelsat 709 and Intelsat 702 will be operated in the same station-keeping box until Intelsat 702 is redeployed.

⁸ 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).