

S2396 SAT-STA-20120426-00076 IB2012001116  
Intelsat License LLC  
Intelsat 709



\*with conditions

File # SAT-STA-20120426-00076

Call Sign S2396 Grant Date 06/13/12  
(or other identifier)

Term Dates period of  
From 06/15/12 To: 180 days

Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch

Approved by OMB  
3060-0678

Date & Time Filed: Apr 26 2012 5:49:41:193PM  
File Number: SAT-STA-20120426-00076  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for 180-Day STA to Drift Intelsat 709 to 47.5 E.L. (Call Sign S2396)


I. 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 to Grant**  
**IBFS File No. SAT-STA-20120426-00076**  
**Call Sign S2396**

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-STA-20120426-00076, is granted. Accordingly, Intelsat is authorized for a period of 180 days, commencing on June 15, 2012, to continue to operate Telemetry, Tracking, and Control (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 (Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (space-to-Earth)<sup>1</sup>. 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. Grant of this special temporary authority is without prejudice to any action on IBFS File No. SAT-MOD-20120605-00094.
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
6. 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.

 <b>GRANTED*</b> International Bureau *with conditions	<b>File #</b> <u>SAT-STA-20120426-00076</u>
	<b>Call Sign</b> <u>S2396</u> <b>Grant Date</b> <u>06/13/12</u> <b>(or other identifier)</b>
	<b>Term Dates</b> <u>period of</u> <b>From</b> <u>06/15/12</u> <b>To:</b> <u>180 days</u>
	<b>Approved:</b> <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

<sup>1</sup> Intelsat is currently authorized to operate TT&C for a period of 30 days pursuant to a grant of special temporary to drift Intelsat 709 from 72.1 E.L. to 47.5 E.L. under the same conditions as the instant application. IBFS File No. SAT-STA-20120409-00066 (granted May 16, 2012). Intelsat also has a pending application to operate Intelsat 709 at 47.5° E.L. See IBFS File No. SAT-MOD-20120605-00094.

<b>2. Contact</b>			
<b>Name:</b>	Susan H. Crandall	<b>Phone Number:</b>	202-944-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall	<b>Relationship:</b>	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 SATSTA2012040900066 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 180 days, commencing upon grant, 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).

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**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 26, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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")<sup>1</sup> for 180 days, commencing upon grant, to drift Intelsat 709 (call sign S2396) from 72.1° E.L. to 47.5° E.L.<sup>2</sup> At 47.5° E.L., Intelsat 709 will operate in inclined orbit mode pursuant to the ITU filings of the German Administration.<sup>3</sup>

Intelsat 709 currently is authorized to operate at 72.1° E.L.<sup>4</sup> 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

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> 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).

<sup>3</sup> 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.).

<sup>4</sup> *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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April 26, 2012  
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702, which currently operates at 47.5° E.L.,<sup>5</sup> 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.<sup>6</sup> 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

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<sup>5</sup> 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).

<sup>6</sup> 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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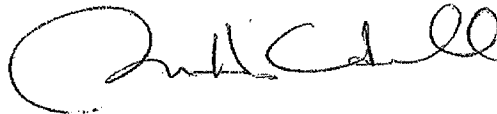
operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference.

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.<sup>7</sup> 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.<sup>8</sup>

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

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

<sup>8</sup> 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).