

June 11, 2012

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



Re: Request for Extension of Special Temporary Authority
to Drift Intelsat 709
Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 60-day extension – from June 15, 2012 through August 13, 2012 – of the Special Temporary Authority ("STA")¹ previously granted Intelsat 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 has a pending application to modify the Intelsat 709 license to allow its permanent operation at 47.5° E.L.⁴

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-00869, File No. SAT-STA-20120409-00066 (May 18, 2012) (Public Notice).

³ 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 *Intelsat License LLC, Modification to Relocate and Operate Intelsat 709 in Inclined Orbit Mode at 47.5 E.L.*, File No. SAT-MOD-20120605-00094 (filed Jun. 5, 2012).

Intelsat 709 currently is authorized to operate at 72.1° E.L.⁵ On May 16, 2012, Intelsat began drifting Intelsat 709 to 47.5° E.L. pursuant to a grant of Special Temporary Authority.⁶ Intelsat expects to have Intelsat 709 on station at that location in mid-October 2012.⁷ Intelsat 709 will replace the Intelsat 702 satellite (Call Sign S2388), which currently operates at the 47.5° E.L. location.⁸ 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., is scheduled to be redeployed later this year.

During the drift of Intelsat 709 from 72.1° E.L. to 47.5° E.L., Intelsat will continue to utilize only the satellite's TT&C frequencies and will continue to 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)

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

⁶ See *supra* n. 1. Intelsat also has a pending 180-day STA request to redeploy Intelsat 709 to 47.5° E.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00867, DA 12-743, File No. SAT-STA-20120426-00076 (May 11, 2012).

⁷ Intelsat currently expects to operate Intelsat 709 at 47.5° E.L. until its end-of-life, which currently is anticipated to be the end of March 2013.

⁸ See *Policy Branch Information; Actions Taken*, Report No. SAT-00857, File No. SAT-STA-20120315-00046 (Apr. 6, 2012) (Public Notice). Intelsat recently received authority to continue operating the Intelsat 702 satellite at this location for an additional 180 days. See *Policy Branch Information; Actions Taken*, Report No. SAT-00866, File No. SAT-STA-20120329-00063 (May 11, 2012) (Public Notice).

Ms. Marlene H. Dortch
June 11, 2012
Page 3

3952.5 MHz (RHCP)
3952.0 MHz (RHCP)

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

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will continue to 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.

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.⁹ 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.¹⁰

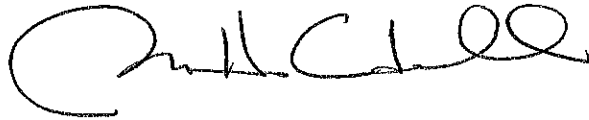
⁹ Intelsat 709 and Intelsat 702 will be operated in the same station-keeping box until Intelsat 702 is redeployed.

¹⁰ 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

Ms. Marlene H. Dortch
June 11, 2012
Page 4

For the reasons set forth herein, 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 fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley

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