

June 21, 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 and Operate  
Intelsat 9 (Call Sign S2380)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 180 days, commencing November 1, 2012, to drift Intelsat 9 (call sign S2380) from 58.0° W.L. to 43.10° W.L. and operate at 43.10° W.L. in inclined orbit mode.<sup>2</sup> At the nominal orbital location of 43.0° W.L., Intelsat 9 will operate co-located with Intelsat 11.<sup>3</sup>

Intelsat 9 currently is authorized to operate at 58.0° W.L.<sup>4</sup> Intelsat 21 (call sign S2863), which currently is scheduled for launch on August 15, 2012, will replace Intelsat 9 at 58.0° W.L.<sup>5</sup> Following traffic transfer from Intelsat 9 to Intelsat 21, Intelsat 9 will be relocated to 43.10° W.L.<sup>6</sup> Subject to receipt of

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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 expects to begin inclined orbit operations after traffic has been transferred and before the satellite begins drifting. The satellite's expected end of life, assuming the drift and inclined orbit operations, is September 2023.

<sup>3</sup> Intelsat will shortly file an application to modify the Intelsat 9 license to allow the satellite's permanent redeployment to 43.10° W.L.

<sup>4</sup> See *PanAmSat Licensee Corp. Application for Authority to Construct, Launch and Operate an Expansion Band Satellite in its Separate International Communications Satellite System*, Order and Final Authorization, 13 FCC Rcd 4743 (1997) and *PanAmSat Licensee Corp. Application for Authority to Use Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642 (2005).

<sup>5</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00862, File No. SAT-RPL-20120326-00061 (Apr. 27, 2012) (Public Notice).

<sup>6</sup> Intelsat has a pending Petition for Specific Authority Under Section 25.161(c) seeking authority to retain its license to the 11.7-12.2 GHz and 14.0-14.5 GHz Ku-band frequencies at the nominal 43.0° W.L. orbital location. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report

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FCC approval, Intelsat expects to begin drifting Intelsat 9 on November 1, 2012 and have the satellite on-station at 43.10° W.L. by the end of December 2012.

During the drift of Intelsat 9 from 58.0° W.L. to 43.10° W.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:

14494.5 MHz (V)

14000.5 MHz (RHCP)

Downlink:

11700.5 MHz (V)

11702.5 MHz (V)

11700.5 MHz (RHCP)

11702.5 MHz (RHCP)

11700.5 MHz (H)

11702.5 MHz (H)

The Intelsat 9 communications frequencies are as follows:

Uplink:

5925 – 6425 MHz

14000 – 14500 MHz

Downlink:

3700 – 4200 MHz

11450 – 11700 MHz

11700 – 12200 MHz

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Grant of this STA request is in the public interest because it will allow Intelsat to expand customer services at the 43.10° W.L. location.<sup>7</sup>

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 operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station, Intelsat will operate the TT&C and communications frequencies in accordance with its coordination agreements governing the nominal 43.0° W.L. 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 9 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>8</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 9 at 43.10° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 9 at 43.10° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the waiver previously granted Intelsat 9 of footnote NG 104 of Section 2.106 and footnote 2 of Section 25.202(a)(1) with respect to the domestic use of the 11450-11700 MHz band continue to apply at 43.10° W.L.<sup>9</sup>

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<sup>7</sup> As noted above, all customers with current contracts operating on Intelsat 9 at 58.0° W.L. at the time of the planned redeployment to 43.10° W.L. will be accommodated on Intelsat 21 prior to the former satellite's drift.

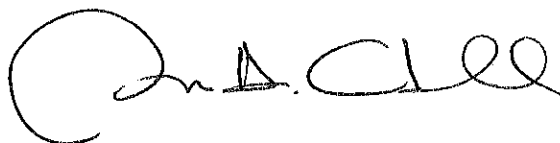
<sup>8</sup> Intelsat 9 and Intelsat 11 will be operated in adjacent station-keeping boxes.

<sup>9</sup> *PanAmSat Licensee Corp. Application for Authority to Use Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642 (2005).

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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 "S. H. Crandall". The signature is written in a cursive style with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley