

July 10, 2012

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



Re: Request for Further Extension of Special Temporary  
Authority to Operate Intelsat 701  
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day further extension – through August 15, 2012 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to stop the drift of Intelsat 701 (call sign S2400) and operate the satellite at 157.0° E.L. in the C- and Ku-bands in inclined orbit mode.<sup>2</sup>

Intelsat will continue to utilize the following TT&C frequencies on Intelsat 701 at 157.0° E.L.:

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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> See *Intelsat License LLC Request for Further Extension of Special Temporary Authority*, File No. SAT-STA-20120612-00096 (stamp grant issued June 17, 2012 by Stephen J. Duall); *Intelsat License LLC Request for Further Extension of Special Temporary Authority*, File No. SAT-STA-20120511-00084 (stamp grant issued June 6, 2012 by Stephen J. Duall); *Policy Branch Information; Actions Taken*, Report No. SAT-00863, File No. SAT-STA-20120413-00067 (Apr. 27, 2012) (Public Notice); Report No. SAT-00856; File No. SAT-STA-20120312-00039 (Mar. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00846, File No. SAT-STA-20120209-00015 (Feb. 17, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-STA-20120113-00006 (Feb. 3, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00831, File No. SAT-STA-20111213-00238 (Dec. 23, 2011) (Public Notice).

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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)

Intelsat will continue to utilize the following communications frequencies on Intelsat 701 at 157.0° E.L.:

Uplink:

5925 – 6425 MHz  
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz  
10950 – 11200 MHz  
11450 – 11700 MHz  
11700 – 11950 MHz  
12500 – 12750 GHz

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue to meet customer demand at this location. Intelsat intends to file an application for permanent licensing of a satellite at the 157.0° E.L. location. Intelsat seeks to continue to operate the Intelsat 701 satellite at 157.0° E.L. pursuant to STA because the satellite may need to be redeployed in the near term in order to preserve service continuity at a different location in the event of a launch delay. Intelsat anticipates knowing by mid-September 2012 if Intelsat 701 will remain at 157.0° E.L. and, if so, will file a modification application for continued operations at that time. If Intelsat 701 is redeployed,

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Intelsat expects to bring another satellite to 157.0° E.L. before Intelsat 701 leaves the location and will file appropriate STA and modification applications.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 701 at 157.0° E.L. in accordance with any applicable coordination agreements.

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 701 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 701 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 157.0° E.L. location, namely, the waivers of Sections 25.140(b)(2), 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.<sup>3</sup>

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<sup>3</sup> See *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), *recon. denied*, 15 FCC Rcd 25234 (2000).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this extension 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 a long, sweeping underline.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Kathryn Medley