

July 11, 2012

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



Re: Request for Special Temporary Authority to Conduct In-Orbit
Testing of Intelsat 21 (File No. SAT-RPL-20120326-00061)
Call Sign S2863

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from August 28, 2012 through September 26, 2012, to conduct in-orbit testing ("IOT") of Intelsat 21 (Call Sign S2863) at 51.3° W.L. in the bands 3700-4200 MHz (downlink), 5925-6425 MHz (uplink), 11450-11700 MHz, 11700-12200 MHz (downlink), and 14000-14500 MHz (uplink), and to drift the satellite to its permanent location of 58.0° W.L.² Intelsat 21 currently is scheduled to be launched on August 16, 2012. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 21, Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat's knowledge, the only co-frequency satellites within plus/minus six degrees of 51.3° W.L. are Intelsat 707 at 53.0° W.L., Intelsat 805 at 55.5° W.L., Galaxy 11 at 55.5° W.L., Intelsat 1R at 50.0° W.L., NSS 703 at 47.05° W.L., TDRS 3 at 49.0° W.L., and Inmarsat 3-F4 at 54.0° W.L. Intelsat currently is in coordination discussions with SES World Skies, the operator of NSS 703; Inmarsat, the operator of Inmarsat 3-F4; and the United States Government, the operator of TDRS 3, regarding the Intelsat 21

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² 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). During the drift from 51.3° W.L. to 58.0° W.L., only the satellite's TT&C frequencies will be utilized. The TT&C frequencies are 13994.5 MHz (V) and 13750.5 MHz (LHCP) (Earth-to-space); and 11451.25 MHz (V and LHCP), 11451.75 MHz (V and LHCP), 11453.25 MHz (V and LHCP) and 11453.75 (V and LHCP) (space-to-Earth).

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IOT. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites.

In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the 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 during in-orbit testing at 51.3° W.L. Intelsat 21 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 21. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 21 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the waivers of Section 25.202(g) and footnote 2 to Section 25.202(a)(1) and footnote NG104 of the U.S. Table of Frequency Allocations requested in the pending application also apply during IOT at 51.3° W.L. and during the drift to 58.0° W.L.³

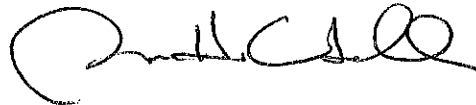
The in-orbit testing of Intelsat 21 at 51.3° W.L. is a critical step in ensuring that the satellite will be fully operational at 58.0° W.L. This, in turn, will ensure continuity of service to customers at the 58.0° W.L. location, and thereby promotes the public interest.

³ *Intelsat License LLC, Application for Authority to Launch and Operate Intelsat 21, a Replacement Satellite, at 58.0° W.L.*, File No. SAT-RPL-20120326-00061 at 6-8 (filed Mar. 26, 2012)

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For the reasons set forth herein, Intelsat respectfully requests that the Commission 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: Robert Nelson
Kathryn Medley
Stephen Duall
Jay Whaley