August 15, 2012

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat 8 (Call Sign S2460)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")[1] for 30 days, commencing September 8, 2012, to drift Intelsat 8 (call sign S2460) from 166.0° E.L. to 169.0° E.L. and operate at 169.0° E.L.[2] At the 169.0° E.L., Intelsat 8 will operate co-located with Intelsat 5.[3]

Intelsat 8 currently is authorized to operate at 166.0º E.L.[4] Following traffic transfer to other Intelsat satellites, Intelsat 8 will be relocated to 169.0º E.L. Subject to receipt of FCC approval, Intelsat expects to begin drifting Intelsat 8

[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] Intelsat has a pending application to modify the Intelsat 8 license to allow the satellite's permanent redeployment to 169.1° E.L. *See Policy Branch Information; Satellite Applications Accepted for Filing*, File No. SAT-MOD-20120619-00100 (July 20, 2012) (Public Notice). Intelsat concurrently is filing to amend that application to seek operational authority at 169.0º E.L. rather than 169.1° E.L.

[3] The end of life of Intelsat 8, assuming the drift and station-kept operations, is expected to be May 2019. The January 2014 end of life projection for Intelsat 8 listed in Intelsat's 10-K filing is the estimated end of service life. *See Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934*, For the fiscal year ended December 31, 2011, Intelsat S.A. (Mar. 1, 2012) available at http://www.intelsat.com/_files/investors/financial/2011/Q4-2011-Intelsat-Form10K.pdf. The service life is a more conservative estimate that may be adjusted subsequently to reflect potential fuel life based on the health of the satellite.

[4] *See PanAmSat Licensee Corp. Application for Authority to Construct, Launch and Operate a Hybrid International Communications Satellite*, 14 FCC Rcd 2719 (1998); *Policy Branch Information; Actions Taken*, Report No. SAT-00358, DA 06-980, File No. SAT-MOD-20060228-00017 (May 5, 2006) (Public Notice).

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on or about September 8, 2012 and have the satellite on-station at 169.0° E.L. approximately 10 days later.[5]

During the drift of Intelsat 8 from 166.0° E.L. to 169.0° 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:

13998.0 MHz (RHCP)

Downlink:

12747.0 MHz (H)
12748.0 MHz (V)
12747.0 MHz (LHCP)
12748.0 MHz (RHCP)

The Intelsat 8 communications frequencies are as follows:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
12250-12750 MHz

Grant of this STA request is in the public interest because it will allow Intelsat to expand customer services at the 169.0° E.L. location.[6]

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

[5] Intelsat is seeking a 30-day STA in order to accommodate a potential delay in the start of drift.

[6] As noted above, all customers with current contracts operating on Intelsat 8 at 166.0° E.L. at the time of the planned redeployment to 169.0° E.L. will be accommodated on other Intelsat satellites prior to the Intelsat 8 drift.

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 169.0° E.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. With the exception of Intelsat 5, Intelsat 8 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.[7] 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 8 at 169.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 8 at 169.0° 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 waiver previously granted Intelsat 8 of Section 2.106 with respect to use of the 12250-12750 MHz frequency band on a non-interference, non-protected basis in ITU Region 2 continue to apply at 169.0° E.L.[8]

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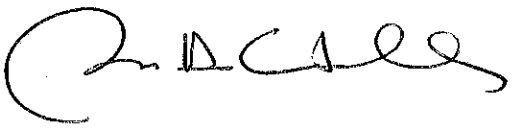
[7] Intelsat 8 and Intelsat 5 will be operated in the same station-keeping box until Intelsat 5 is relocated.

[8] *See PanAmSat Licensee Corp. Application for Modification of Authority to Operate the PAS-5 Satellite at the 166° E.L. Orbital Location*, Order and Authorization, DA 06-6, File Nos. SAT-MOD-19980928-00078, SAT-AMD-19990222-00024, SAT-AMD-20020326-00055, SAT-STA-20020705-00097, and SAT-AMD-20051116-00220, 21 FCC Rcd 36, ¶ 1 (Jan. 4, 2006). The Intelsat 8 satellite previously was known as PAS-5.

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