



File # SAT - STA - 20120815 - 00132

Call Sign S2460 Grant Date 8/31/12

(or other identifier)

From 9/8/12 Term Dates To: 11/7/12

Approved by OMB  
3060-0678

Approved: Kathryn Medley  
*Kathryn Medley, Chief Satellite Engrg. Br.*

Date & Time Filed: Aug 15 2012 4:59:43:320PM  
File Number: SAT-STA-20120815-00132  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY  
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

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

1. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	202-944-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	c/o Intelsat Corporation 3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall		

**Intelsat License LLC**  
**IBFS File No. SAT-STA-20120815-00132**  
**Call Sign: S2460**

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT-STA-20120815-00132, IS GRANTED. Specifically, Intelsat is authorized, for a period of 60 days, commencing on September 8, 2012, to conduct telemetry, tracking, and command functions necessary to drift the Intelsat 8 space station (Call Sign S2460) from the 166.0 E.L. orbital location to the 169.0° E.L. orbital location. Intelsat is authorized to use the 12747 MHz (space-to-Earth), 12748 MHz (space- to-Earth) and the 13998 MHz (Earth-to-space) frequencies for drift operations. Intelsat is also authorized to operate Intelsat 8 at the 169.0° E.L. orbital location to provide Fixed-Satellite Service (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 12.25-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. Operations under this special temporary authorization must be in accordance with the terms and conditions contained in Intelsat's application, the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

1. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radiocommunication system.


2. In the event of any harmful interference as a result of the operations under this grant of special temporary authority, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.

3. Intelsat is granted a waiver of the U.S. Table of Frequency Allocations, Section 2.106 of the Commission's rules, to operate Intelsat 8 in the 12.25-12.75 GHz frequency band (space-to-Earth) to communicate with Intelsat's fixed earth station in Napa, California, as well as the visible portions of International Telecommunication Union (ITU) Region 2. The U.S. Table of Frequency Allocations allocates the 12.25-12.70 GHz band to Fixed Service (FS) and Broadcast Satellite Service (BSS) (space-to-Earth) and allocates the 12.70-12.75 GHz band to FS, Mobile Service (MS), and FSS (Earth-to-space). This action is consistent with the waiver granted for the Intelsat 8 at the 166.0° E.L. orbital location. PanAmSat Licensee Corp., *Order and Authorization*, 21 FCC Rcd 36 (Sat. Div. 2006)(PAS-5 Order).<sup>1</sup> Limited waiver of the U.S. Table of Allocations is justified in the unique circumstances presented here. Specifically, Intelsat's proposed operations will have a large orbital separation from any other satellite operating in this band in ITU Region 2. Further, due to its orbital location, Intelsat 8 has very limited coverage of the United States.<sup>2</sup> Intelsat 8's operations at 169.0° E.L. orbital location in the 12.25-12.75 GHz frequency band in Region 2 are subject to the following additional condition:

In accordance with the U.S. Table of Frequency Allocations, Footnote NG53, Intelsat's

<sup>1</sup> At the time of launch, Intelsat 8 was named PAS-8 for commercial purposes, but PAS-5 for FCC filings. In 2007, Intelsat filed a letter notifying the Commission that it had renamed PAS-8/PAS-5 (Call Sign 2460) as Intelsat 8. See Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, dated Jan. 8, 2007, available in File No. SAT-MOD-20060228-00017. SAT-STA-20120815-00132

<sup>2</sup> See Comments of DIRECTV Enterprises, LLC, at 2 (filed August 20, 2012).

 "As Conditioned" 1 <b>GRANTED</b> International Bureau	Call Sign <u>S2460</u> Grant Date <u>8/31/12</u>
	(or other identifier)
	Term Dates From <u>9/8/12</u> To: <u>11/7/12</u>
	Approved: <u>Kathryn Medley</u> Kathryn Medley (Chief Satellite Eng.)

**Intelsat License LLC**  
**IBFS File No. SAT–STA–20120815–00132**  
**Call Sign: S2460**

use of the 12.7-12.75 GHz frequency band must accept and not cause interference to existing television pickup stations and Cable Television Relay Station (“CARS”) band users or any other users in the band operating in accordance with the U.S. Table of Frequency Allocations. If Intelsat precludes the establishment of a new CARS link due to interference from, or to, Intelsat's downlink in the 12.7-12.75 GHz frequency band, Intelsat shall vacate the band.

4. Intelsat 8’s transmissions in the 12.25–12.70 GHz frequency band in ITU Region 2 from the 169° E.L. orbital location must comply with the space-to-Earth power flux density (PFD) limits in Article 21.16 of the ITU Radio Regulations.

5. Intelsat shall inform its customers in Region 2 using the 12.25-12.75 GHz band, in writing, that its operations must cease in the event they cause interference to any other lawfully operating radiocommunication systems in the 12.25-12.75 GHz band. In addition, Intelsat shall inform its customers in Region 2 using the 12.25-12.75 GHz band, in writing, that its operations are on an unprotected basis and are therefore subject to interference from authorized services in the 12.25-12.75 GHz frequency band.

6. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat’s pending application for regular authority to operate Intelsat 8 at the 169.0° E.L. orbital location (IBFS File No. SAT-MOD-20120619-00100) or its pending application to operate Intelsat 19 at the 166.0° E.L. orbital location (IBFS File No. SAT-MOD-20120628-00107).

7. Any action taken or expense incurred as a result of operations pursuant to this grant of special temporary authority is at Intelsat’s own risk.

8. This action is issued pursuant to Section 0.261 of the Commission’s rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.

2. Contact

<b>Name:</b>	Susan H. Crandall	<b>Phone Number:</b>	202-944-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall	<b>Relationship:</b>	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification    CRY - Space Station (Geostationary)

5. Type Request

- Change Station Location                       Extend Expiration Date                       Other

6. Temporary Orbit Location

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests Special Temporary Authority for 60 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. At 169.0 E.L., Intelsat 8 will operate co-located with Intelsat 5.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.  Yes  No

10. Name of Person Signing  
Susan H. Crandall

11. Title of Person Signing  
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

August 15, 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 8 (Call Sign S2460)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> 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.<sup>2</sup> At the 169.0° E.L., Intelsat 8 will operate co-located with Intelsat 5.<sup>3</sup>

Intelsat 8 currently is authorized to operate at 166.0° E.L.<sup>4</sup> Following traffic transfer to other Intelsat satellites, Intelsat 8 will be relocated to 169.0° E.L. Subject to receipt of FCC approval, Intelsat expects to begin drifting Intelsat 8

---

<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 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 169.0° E.L. rather than 169.1° E.L.

<sup>3</sup> 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.

<sup>4</sup> *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).

Ms. Marlene H. Dortch  
August 15, 2012  
Page 2

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

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.<sup>6</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

---

<sup>5</sup> Intelsat is seeking a 30-day STA in order to accommodate a potential delay in the start of drift.

<sup>6</sup> 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.<sup>7</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 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.<sup>8</sup>

---

<sup>7</sup> Intelsat 8 and Intelsat 5 will be operated in the same station-keeping box until Intelsat 5 is relocated.

<sup>8</sup> 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.

Ms. Marlene H. Dortch  
August 15, 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 "S. 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