

August 23, 2012

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



Re: Request for Extension of Special Temporary Authority for Intelsat 20,
File No. SAT-LOA-20111024-00208, Call Sign S2847

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days —from August 29, 2012 through September 27, 2012 — of the Special Temporary Authority (“STA”)¹ previously granted Intelsat for its Intelsat 20 satellite (Call Sign S2847) to (1) seek a waiver of the U.S. Table of Frequency Allocations to permit launch and early orbit phase (“LEOP”) operations using downlink frequencies in the 12700-12750 MHz band in Region 2;² (2) conduct in-orbit testing (“IOT”) at 63.15° E.L.; and (3) drift the satellite to its permanent location of 68.5° E.L.³ Intelsat 20 was launched on August 2, 2012 and currently is undergoing in-orbit testing.

IOT. Intelsat will continue to conduct in-orbit testing of Intelsat 20 (Call Sign S2847) at 63.15° E.L. in the bands 3700-4200 MHz (downlink), 5925-6675 MHz (uplink), 10950-11200 MHz (downlink), 11450-11700 MHz (downlink), 12500-12750 MHz (downlink), 13750-14500 MHz (uplink), 29500-30000 MHz (uplink) and 19700-20200 MHz (downlink). To Intelsat’s knowledge, the only co-frequency satellites within plus/minus six degrees of 63.15° E.L. are Intelsat 904 at 60.0° E.L., Intelsat 902 at 62.0° E.L., Intelsat 906 at 64.15° E.L., Intelsat 17 at 66.0° E.L., Intelsat 7 at 68.65 E.L., Intelsat 10 at 68.5° E.L., and Inmarsat 3-F1 at 64.5° E.L. Intelsat will continue to coordinate with Inmarsat, the operator of Inmarsat 3-F1, regarding the Intelsat 20 IOT. With

¹ Intelsat has filed this STA request, an FCC Form 159, a \$860.00 filing fee and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² The authorization for the Intelsat 20 satellite does not seek authority to operate the Intelsat 20 satellite in the 12700-12750 MHz band in Region 2. *See Policy Branch Information; Actions Taken*, Report No. SAT-00886, File No. SAT-LOA-20111024-00208 (July 27, 2012) (Public Notice).

³ *See Policy Branch Information; Actions Taken*, Report No. SAT-00887, File No. SAT-STA-20120622-00104 (Aug. 3, 2012) (Public Notice). Only the TT&C frequencies will continue to be used during the satellite’s drift from 63.15° E.L. to 68.5° E.L.

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regard to the remaining spacecraft, Intelsat will continue to 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 is aware that FSS operations are not authorized in the 12500-12750 MHz band in Region 2. In-orbit testing of Intelsat 20 will continue to be conducted by earth stations located outside the United States and will not affect satellite or terrestrial operations in the 12500-12750 MHz band in Region 2.

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 63.15° E.L. Intelsat 20 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 20. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 20 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Drift. During the drift from 63.15° E.L. to 68.5° 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:

13750.5 (V)
14498.0 (V)
13750.5 (LHCP)
14498.5 (LHCP)

Downlink:

12746.5 (V)
12747.0 (V)
12748.0 (V)
12748.5 (V)
12746.5 (LHCP)
12747.0 (LHCP)
12748.0 (LHCP)
12748.5 (LHCP)

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Grant of this STA extension request will facilitate the continued in-orbit testing of Intelsat 20 at 63.15° E.L., which is a critical step in ensuring that the satellite will be fully operational at 68.5° E.L. The subsequent drift of the satellite to 68.5° E.L. will ensure continuity of service to customers, and thereby promotes the public interest.

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 "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall
Jay Whaley