

September 10, 2012

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



Re: Request for Extension of Special Temporary Authority to Drift
Intelsat 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—through October 14, 2012—of the Special Temporary Authority ("STA")¹ originally granted Intelsat to drift Intelsat 706 (call sign S2401) from 72.0° E.L. to 157.0° E.L., where it will eventually operate in the C- and Ku-bands² in inclined orbit.³ As explained below and in the original STA request, Intelsat 706 is being redeployed to 157.0° E.L. on an emergency basis, in order to free up Intelsat 701 to move to 330.5° E.L. to ensure traffic continuity at 330.5° E.L. in light of the recently-incurred Intelsat 23 launch delay. Intelsat currently expects to operate Intelsat 706 at 157.0° E.L. until the satellite is de-orbited in the second half of 2014.

Intelsat 706 currently is drifting to 157.0° E.L. and is expected to be on-station at that location in mid-February 2013. During the drift of Intelsat 706 from 72.0° E.L. to 157.0° E.L., Intelsat will continue to operate only the satellite's TT&C frequencies and will coordinate the drift with potentially affected operators.

The specific TT&C frequencies are as follows:

Uplink:

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00890, File No. SAT-STA-20120809-00126 (Aug. 17, 2012) (Public Notice). Intelsat continues to seek only drift authority and intends shortly to file a permanent license modification application seeking operational authority at 157.0° E.L.

³ Intelsat 706 began operating in inclined orbit mode last year. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

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6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue the redeployment process necessary to ensure continuity of service at 330.5° E.L., where Intelsat 801 (call sign S2391) currently operates. Given the recent failure of the Proton rocket, the launch of Intelsat 23 (call sign S2831), which is to replace Intelsat 707 (call sign S2398) at 307.0° E.L., will be delayed. As a result, Intelsat 707 may not have sufficient fuel to be redeployed to 330.5° E.L. as planned. Accordingly, Intelsat has decided to redeploy Intelsat 701, which currently operates at 157.0° E.L., to 330.5° E.L. in order to ensure service continuity at the latter location. Intelsat 706 is being redeployed immediately in order to free up Intelsat 701 to move to 330.5° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue to coordinate the drift with all potentially affected operators.

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. Except briefly while collocated with Intelsat 701, Intelsat 706 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 706 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 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 706 spacecraft continue to apply at the 157.0° E.L. location,

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namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.⁴

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Stephen Duall
Jay Whaley

⁴ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).