

September 11, 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 Intelsat 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days—from October 21, 2012 through November 20, 2012—to drift Intelsat 5 (call sign S2704) from 169.0° E.L. to 65.45° E.L., where it will eventually operate in the C- and Ku-bands under new U.S. ITU filings.² Intelsat also seeks to extend the Intelsat 5 license term, which currently expires on October 26, 2012, for the duration of this STA request. Intelsat expects shortly to file an application for modification of the Intelsat 5 license to allow for its permanent operation at 65.45° E.L. That modification application will include a request to extend the Intelsat 5 license for a longer term.

Intelsat 5 currently is operating at 169.0° E.L.³ Subject to receipt of FCC approval, Intelsat 5 will be relocated to 65.45° E.L.—with the drift starting October 21, 2012 and the satellite on-station in late May 2013.

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 is not herein seeking authority to operate the satellite's communications payload. Intelsat expects to begin inclined orbit operations upon commencement of the drift and will thereafter file the notice required by Section 25.280 of the FCC's rules. 47 C.F.R. §25.280.

³ See Policy Branch Information; Actions Taken, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008).

During the drift of Intelsat 5 from 169.0° E.L. to 65.45° 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:

14498 MHz (H)
13999 MHz (RHCP)

Downlink:

11451 MHz (H, V and RHCP)
11452 MHz (H, V and RHCP)
11454 MHz (RHCP and LHCP)

Grant of this STA request is in the public interest because it will allow Intelsat to meet anticipated customer demand at 65.45° E.L. Continued operation of the Intelsat 5 satellite beyond October 26, 2012 also serves the public interest by enabling customers to receive additional services with this in-orbit spacecraft prior to its de-orbit. The FCC has already approved a post-mission disposal plan for the Intelsat 5 satellite that reserves 21.2 kg of fuel for an intended de-orbit of 150 km.⁴

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 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 at 65.45° E.L. and subject to FCC approval, Intelsat plans to operate the communications payload in conformance with its coordination agreements related to that location or on a non-interference, non-protected basis.

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. Intelsat 5 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

⁴ *See id.* SIA also has pending a request for blanket waiver of the requirement to vent all fuel, which includes the Intelsat 5 satellite. Satellite Industry Association, Request for Blanket Waiver of Section 25.283(c) of the Commission's Rules (filed 10/1/2010).

Ms. Marlene H. Dortch

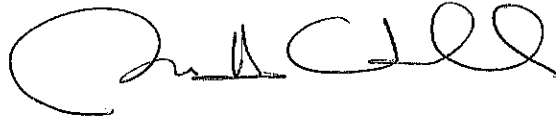
September 11, 2012

Page 3

FCC, having an overlapping station-keeping volume with Intelsat 5 at 65.45° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 65.45° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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 "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: Stephen Duall
Jay Whaley