

September 17, 2012

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



Re: Request for Further Extension of Special Temporary Authority to
Operate Galaxy 12
Call Sign S2422

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 60-day further extension -- through November 22, 2012 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Galaxy 12 (call sign S2422) from 132.9° W.L. to 129.0° W.L. and begin operating at 129.0° W.L.² Intelsat has a pending application for permanent authority to operate Galaxy 12 at 129.0° W.L. in the C-band.³

Galaxy 12 is currently operating at 129.0° W.L. utilizing the following frequencies.

The specific TT&C frequencies are as follows:

Uplink:

6424.5 MHz (RHCP), (H)

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-00887, File No. SAT-STA-20120720-00119 (Aug. 3, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00873, File No. SAT-STA-20120521-00086 (June 8, 2012) (Public Notice); *Policy Branch Information Actions Taken*; Report No. SAT-00861, File No. SAT-STA-20120323-00060 (Apr. 20, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00844, File No. SAT-STA-20120124-00009 (Feb. 10, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00838, File No. SAT-STA-20111227-00252 (Jan. 20, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00826, File No. SAT-STA-20111118-00223 (Dec. 2, 2011) (Public Notice).

³ See *Policy Branch Information; Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00824, File No. SAT-MOD-20111011-00197 (Nov. 18, 2011) (Public Notice).

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Downlink:

4198 MHz (LHCP), (V)
4199.875 MHz (LHCP), (V)

The specific communications frequencies are as follows:

3700-4200 MHz (space-to-Earth)
5925-6425 MHz (Earth-to-space)

Intelsat requests that the waiver of Section 25.283(c) of the Commission's rules continue to apply at the 129.0° W.L. orbital location.⁴

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue operating Galaxy 12 at 129.0° W.L. while the Commission completes its consideration of the pending application for permanent authority. Intelsat understands and accepts that a grant of this STA further extension would not prejudice the Commission's determination of Intelsat's request to operate Galaxy 12 at 129.0° W.L. on a permanent basis, and that operation pursuant to this STA is at Intelsat's risk.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Galaxy 12 in conformance with its coordination agreements related to the 129.0° W.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. Galaxy 12 is not 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 Galaxy 12 at 129.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 12 at 129.0° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁴ 47 C.F.R. § 25.283(c). *See Policy Branch Information; Actions Taken*, Report No. SAT-00730, File Nos. SAT-MOD-20100120-00013 and SAT-AMD-20100514-00102 (Oct. 22, 2010) (Public Notice).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously 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: Stephen Duall
Jay Whaley