

September 25, 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 and Operate
Intelsat 10
Call Sign S2382

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days -- from October 18, 2012 through November 16, 2012 -- to drift Intelsat 10 (call sign S2382) from 68.5° E.L. to 47.5° E.L., and to operate it at that location in the C- and Ku-bands pursuant to the ITU filings of the German Administration.² Intelsat expects shortly to file an application for modification of the Intelsat 10 license to allow for its permanent operation at 47.5° E.L.

Intelsat 10 currently is operating at 68.5° E.L.³ Intelsat 20 recently commenced operations at 68.5° E.L.⁴ Subject to receipt of FCC

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 incorporates herein by reference the description of Europe*Star Gesellschaft Fur Satellitenkommunikation mbH ("Europe*Star"), the entity that holds the authorization to operate at 47.5° E.L., set forth on page 2 of its STA request, File No. SAT-STA-20110715-00129. Intelsat further incorporates by reference the New Slot Usage Agreement between Europe*Star and PanAmSat Europe, as well as Europe*Star's authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC. *See Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

³ *See PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Replacement Hybrid Fixed-Satellite Service Space Station at 68.5 E.L. Known as PAS-24*, 16 FCC Rcd 13145, File Nos. SAT-LOA-19991119-00112, SAT-STA-20010608-00049, and SAT-STA-20010627-00059 (2001).

⁴ *See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, File No. SAT-LOA-20111024-00208 (filed Sept. 20, 2012).*

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approval, Intelsat 10 will be relocated to 47.5° E.L. – with the drift starting October 18, 2012 and the satellite on-station in late December 2012. At 47.5° E.L., Intelsat 10 will be collocated with Intelsat 709.

During the drift of Intelsat 10 from 68.5° E.L. to 47.5° 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:

14000.5 MHz (RHCP)
14499.5 MHz (H)

Downlink:

12747.5 MHz (H and RHCP)
12748.5 MHz (H and RHCP)

Once on-station at 47.5° E.L., Intelsat will operate the following Intelsat 10 communications frequencies:

3700-4200 MHz
5925-6425 MHz

14.0-14.5 GHz
11.45-11.7 GHz
12.25-12.75 GHz

Grant of this STA request is in the public interest because it will allow Intelsat to meet customer demand at 47.5° E.L.

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 47.5° E.L., Intelsat will operate the communications payload in conformance with Germany's coordination agreements related to that location or on a non-interference, non-protected basis.

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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 for Intelsat 709, Intelsat 10 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.⁵ 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 10 at 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 10 at 47.5° 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,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley

⁵ Intelsat 709 and Intelsat 10 for some period of time will be operated in the same station-keeping box. Intelsat will take all necessary measures to ensure safe station-keeping of Intelsat 709 and Intelsat 10.