

September 26, 2012

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



Re: Request for Special Temporary Authority to Operate Intelsat 709,
Call Sign S2396

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)¹ for 60 days—from October 17, 2012 through December 15, 2012—to operate Intelsat 709 (Call Sign S2396) at 47.5° E.L. in inclined orbit mode pursuant to the ITU filings of the German Administration.² Intelsat has a pending application to modify the Intelsat 709 license to allow its permanent operation at 47.5° E.L.³

On May 16, 2012, Intelsat began drifting Intelsat 709 to 47.5° E.L. pursuant to a grant of Special Temporary Authority.⁴ Intelsat expects to

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 Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00881, File No. SAT-MOD-20120605-00094 (July 13, 2012) (Public Notice).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00869, File No. SAT-STA-20120409-00066 (May 18, 2012) (Public Notice); *see also Policy Branch Information; Actions Taken*, Report No. SAT-00875, File No. SAT-STA-20120426-00076 (June 15, 2012). Prior to commencing the drift to 47.5° E.L. Intelsat 709 operated at 72.1° E.L. *See Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

have Intelsat 709 on station at that location in mid-October 2012.⁵ Intelsat 709 will replace the Intelsat 702 satellite (Call Sign S2388), which currently operates at the 47.5° E.L. location.⁶ Intelsat 702 is scheduled to be redeployed later this year.

Once on-station at 47.5° E.L., Intelsat will operate the satellite's communications frequencies, as follows:

Downlink:

3700-4200 MHz
10950-11200 MHz
11450-11700 MHz
12500-12750 MHz

Uplink:

5925-6425 MHz
14000-14500 MHz⁷

Grant of this STA extension request is in the public interest because it will allow Intelsat to ensure continuity of service at the 47.5° E.L. location. As noted above, Intelsat plans later this year to redeploy Intelsat 702, which currently operates at 47.5° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. Once on-station at 47.5° E.L., Intelsat will operate the communications payload and TT&C frequencies in conformance with Germany's coordination agreements regarding the 47.5° E.L. orbital location and the FCC's rules governing operations vis-à-vis adjacent locations.

⁵ Intelsat currently expects to operate Intelsat 709 at 47.5° E.L. until its end-of-life, which currently is anticipated to be the end of March 2013.

⁶ See *Policy Branch Information; Actions Taken*, Report No. SAT-00857, File No. SAT-STA-20120315-00046 (Apr. 6, 2012) (Public Notice). Intelsat received authority to continue operating the Intelsat 702 satellite at this location for 180 days through November 15, 2012. See *Policy Branch Information; Actions Taken*, Report No. SAT-00866, File No. SAT-STA-20120329-00063 (May 11, 2012) (Public Notice).

⁷ The 11700-11950 MHz frequency band is also on Intelsat 709, but will not be utilized at 47.5° E.L.

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 702, Intelsat 709 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.⁸ 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 709 at 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 709 at 47.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the Part 25 waivers originally granted to the Intelsat 709 spacecraft continue to apply at the 47.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i) and 25.211(a) of the Commission's rules.⁹

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley

⁸ Intelsat 709 and Intelsat 702 will be operated in the same station-keeping box until Intelsat 702 is redeployed.

⁹ *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 Red 15460, 15529 (Appendix C) (2000) (Memorandum Opinion Order and Authorization), *recon. denied*, 15 FCC Red 25234 (2000) (Order on Reconsideration).