

October 1, 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 702
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 60 days -- from October 20, 2012 through December 18, 2012 -- to drift Intelsat 702 (call sign S2388) from 47.5° E.L. to 33.0° E.L. and to operate it at that location in inclined orbit in the C- and Ku-bands. Intelsat concurrently is filing an application for modification of the Intelsat 702 license to allow for the satellite's permanent operation at 33.0° E.L.

Intelsat 702 currently is operating at 47.5° E.L.² Intelsat 709 is expected to arrive at 47.5° E.L. in mid-October and replace Intelsat 702.³ Subject to receipt of FCC approval, Intelsat 702 will be relocated to 33.0° E.L. -- with the drift starting October 20, 2012 and the satellite on-station in mid-December 2012. At 33.0° E.L., Intelsat 702 will be collocated with Intelsat New Dawn (call sign S2751), which currently operates at 32.8° E.L.⁴

During the drift of Intelsat 702 from 47.5° E.L. to 33.0° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow

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-00866, File Nos. SAT-STA-20120329-00063 and SAT-STA-20120416-00068 (May 11, 2012) (Public Notice).

³ Intelsat 709 currently is drifting to 47.5° E.L. pursuant to STA. See *Policy Branch Information; Actions Taken*, Report No. SAT-00875, File No. SAT-STA-20120426-00076 (June 15, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00869, File No. SAT-STA-20120409-00066 (May 18, 2012) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-MOD-20101029-00228 (Apr. 1, 2011) (Public Notice).

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industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz and 6176.3 (LHCP)

Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)

3952.5 MHz and 3952.0 MHz (RHCP)

Once on-station at 33.0° E.L., Intelsat also will operate the following Intelsat 702 communications frequencies:

Uplink:

5925-6425 MHz

14000-14500 MHz

Downlink:

3700-4200 MHz

10950-11200 MHz

11450-11700 MHz

12500-12750 MHz⁵

Grant of this STA request is in the public interest because it will allow Intelsat to maximize the efficient use of its satellite fleet while bringing additional capacity to Europe, Africa and Asia.

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 33.0° E.L., Intelsat will operate the communications payload in

⁵ Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 33.0° E.L. orbital location.

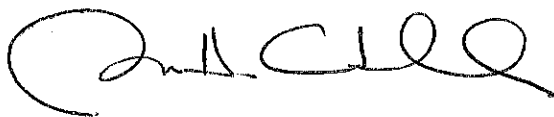
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conformance with Intelsat's coordination agreements related to that location and the FCC's rules governing operations at the location vis-à-vis adjacent locations.

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 702 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 702 at 33.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 33.0° 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