

October 15, 2012

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



Re: Request for Further Extension of Special Temporary Authority to
Conduct In-Orbit Testing of Intelsat 23
(File No. SAT-LOA-20110727-00139)
Call Sign S2831

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days —from October 19, 2012 through November 17, 2012 — of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to conduct in-orbit testing (“IOT”) of Intelsat 23 (Call Sign S2831) at 51.5° W.L. in the bands 3700-4200 MHz (downlink), 5925-6425 MHz (uplink), 11450-11700 MHz, 11700-12200 MHz (downlink), and 14000-14500 MHz (uplink),² and to drift the satellite to its permanent location of 53.0° W.L.³ The launch of Intelsat 23 was delayed and occurred on October 14, 2012. In support of its extension request, Intelsat submits the following information.

During in-orbit testing of Intelsat 23, Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat’s knowledge, the only co-frequency satellites within plus/minus six degrees of 51.5° W.L. are Intelsat 707 at 53.0° W.L., Intelsat 805 at 55.5° W.L., Galaxy 11 at 55.5° W.L., Intelsat 1R at 50.0° W.L., NSS 703 at 47.05° W.L., TDRS 3 at 49.0° W.L., and Inmarsat 3-F4 at

¹ Intelsat has filed this STA request, an FCC Form 159, a \$860.00 filing fee and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² See *Intelsat License LLC.*, Request for Extension of Special Temporary Authority for Intelsat 23, Call Sign S2831, File No. SAT-STA-20120913-00149 (filed Sept. 13, 2012); *Policy Branch Information; Actions Taken*, Report No. SAT-00889, File No. SAT-STA-20120628-00106 (Aug. 10, 2012) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00848, File No. SAT-LOA-20110727-00139 (Feb. 24, 2012) (Public Notice). During the drift from 51.5° W.L. to 53.0° W.L., only the satellite’s TT&C frequencies will be utilized. The TT&C frequencies are 6173.7 (LHCP) and 6176.3 (LHCP) (uplink) and 3947.5 (RHCP), 3948.0 (RHCP), 3952.0 (RHCP), 3952.5 (RHCP) (downlink).

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54.0° W.L. Intelsat currently is in coordination discussions with SES World Skies, the operator of NSS 703; Inmarsat, the operator of Inmarsat 3-F4; and the United States Government, the operator of the TDRS 3, regarding the Intelsat 23 IOT. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 during in-orbit testing at 51.5° W.L. Intelsat 23 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 23. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 23 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 23 at 51.5° W.L. is a critical step in ensuring that the satellite will be fully operational at 53.0° W.L. This, in turn, will ensure continuity of service to customers at the 53.0° W.L. location, and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Robert Nelson
Kathryn Medley
Stephen Duall
Jay Whaley
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