

October 17, 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 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days from date of grant to drift Intelsat 5 (call sign S2704) from 169.0° E.L. to 65.45° E.L. and to operate the satellite at 65.45° E.L. in the C- and Ku-bands under new U.S. ITU filings.² Intelsat also seeks to extend the Intelsat 5 license term, which currently expires on October 26, 2012, for the duration of this STA request.³ Intelsat expects shortly to file an application for modification of the Intelsat 5 license to allow for its permanent operation at 65.45° E.L.

Intelsat 5 currently is operating at 169.0° E.L.⁴ Subject to receipt of FCC approval, Intelsat 5 will be relocated to 65.45° E.L.—with the drift starting October 21, 2012 and the satellite on-station in late May 2013.

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 has a pending 30-day STA request for authority to start drifting Intelsat 5 to 65.45° E.L. *See Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20120911-00147 (filed Sept. 11, 2012). Intelsat expects to begin inclined orbit operations upon commencement of the drift and will thereafter file the notice required by Section 25.280 of the FCC's rules. 47 C.F.R. §25.280.

³ Intelsat has a pending application to modify the Intelsat 5 license to extend the license term through December 31, 2020. *See Intelsat License LLC Application to Modify License*, File No. SAT-MOD-20121002-00176 (filed Oct. 2, 2012).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008).

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During the drift of Intelsat 5 from 169.0° E.L. to 65.45° 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:

14498 MHz (H)

13999 MHz (RHCP)

Downlink:

11451 MHz (H, V and RHCP)

11452 MHz (H, V and RHCP)

11454 MHz (RHCP and LHCP)

Once located at 65.45° E.L., Intelsat also will operate the satellite's communications frequencies as set forth below:

Uplink:

5925-6425 MHz

12750-13250 MHz

14000-14250 MHz

Downlink:

3700-4200 MHz

10700-10950 MHz

11200-11450 MHz

11450-11700 MHz

Grant of this STA request is in the public interest because it will allow Intelsat to meet anticipated customer demand at 65.45° E.L. Continued operation of the Intelsat 5 satellite beyond October 26, 2012 also serves the public interest by enabling customers to receive additional services with this in-orbit spacecraft prior to its de-orbit. The FCC has already approved a post-mission disposal plan for the Intelsat 5 satellite that reserves 21.2 kg of fuel for an intended de-orbit of 150 km.⁵

⁵ See *id.* Intelsat notes that the Satellite Industry Association's pending request for blanket waiver of Section 25.283(c) incorrectly included the Intelsat 5 satellite. *Pleading Cycle Established for Comment on Satellite Industry*

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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 65.45° E.L., Intelsat will operate the communications payload in conformance with its coordination agreements related to that location or on a non-interference, non-protected basis.

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 5 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 5 at 65.45° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 65.45° 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
Cindy Spiers