

October 26, 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 7
Call Sign S2229

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days from date of grant to drift Intelsat 7 (call sign S2229) from 68.65° E.L. to 59.85° E.L., and to operate the satellite at that location in the C- and Ku-bands collocated with Intelsat 904.² Intelsat expects shortly to file an application for modification of the Intelsat 7 license to allow for its permanent operation at 59.85° E.L.

Intelsat 7 currently is operating at 68.65° E.L.³, where it was recently replaced by Intelsat 20.⁴ Subject to receipt of FCC approval, Intelsat 7 will be relocated to 59.85° E.L. – with the drift starting late October 2012 and the satellite on-station in late November 2012.

During the drift of Intelsat 7 from 68.65° E.L. to 59.85° 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.

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 7 to 59.85° E.L. See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20120924-00154 (filed Sept. 24, 2012).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00222, File No. SAT-MOD-20040405-00078 (June 18, 2004) (Public Notice).

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

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The specific TT&C frequencies are as follows:

Uplink:

13998 MHz (RHCP)

Downlink:

11451 MHz (H and LHCP)

11453 MHz (V and LHCP)

Once on-station at 59.85° E.L., Intelsat 7 will operate in the following communications frequencies:

3400-3700 MHz

6425-6725 MHz

10.95-11.2 GHz

11.45-11.7 GHz

13.75-14.25 GHz

Grant of this STA request is in the public interest because it will allow Intelsat to meet additional customer demand at 59.85° 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 Intelsat 7 is on-station at 59.85° 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. Additionally, Intelsat agrees to operate Intelsat 7 at 59.85° E.L. in accordance with the frequency-related conditions in the Commission's 2004 order granting authority for the satellite to operate at 68.5° E.L.⁵

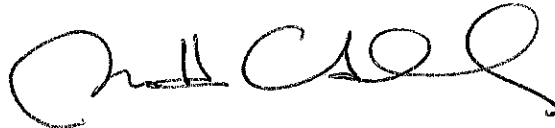
⁵ See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Hybrid Communications Satellite Known at 68.5° E.L.*, Order and Authorization, 19 FCC Rcd 6137, File Nos. SAT-LOA-19960202-00017, SAT-AMD-19960411-0055, SAT-AMD-19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162

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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. Intelsat 7 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 7 at 59.85° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 7 at 59.85° 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

(2004). Intelsat 7's location subsequently was changed to 68.65° E.L.
See supra n.2.