

S2460 SAT-STA-20121105-00191 IB2012002557
Intelsat License LLC
INTELSAT 8



File # SAT-STA-20121105-00191
Call Sign S2460 Grant Date 11/28/12
(or other identifier)
Term Dates period of
From 11/08/12 To: 60 days
Approved: *Stephen J. Duall*

Approved by OMB
3060-0678

Date & Time Filed: Nov 5 2012 3:57:35:073PM
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Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 8 (Call Sign S2460)

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Intelsat License LLC
IBFS File No. SAT–STA–20121105–00191
Call Sign: S2460

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–20121105–00191, is GRANTED. Specifically, Intelsat is authorized, for a period of 60 days, commencing November 8, 2012, to continue to conduct telemetry, tracking, and command functions necessary to drift the Intelsat 8 space station (Call Sign S2460) from the 166.0° E.L. orbital location to the 169.0° E.L. orbital location. Intelsat is authorized to continue to use the 12.747 GHz (space-to-Earth), 12.748 GHz (space-to-Earth) and the 13.998 GHz (Earth-to-space) frequencies for drift operations. Intelsat is also authorized to operate Intelsat 8 at the 169.0° E.L. orbital location to provide Fixed-Satellite Service (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 12.25-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. Operations under this special temporary authorization must be in accordance with the terms and conditions contained in Intelsat's application and the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

1. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radiocommunication system.

2. In the event of any harmful interference as a result of the operations under this grant of special temporary authority, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.

3. Intelsat is granted a waiver of the U.S. Table of Frequency Allocations, Section 2.106 of the Commission's rules, to operate Intelsat 8 in the 12.25-12.75 GHz frequency band (space-to-Earth) to communicate with Intelsat's fixed earth station in Napa, California, as well as the visible portions of International Telecommunication Union (ITU) Region 2. The U.S. Table of Frequency Allocations allocates the 12.25-12.70 GHz band to Fixed Service (FS) and Broadcast Satellite Service (BSS) (space-to-Earth) and allocates the 12.70-12.75 GHz band to FS, Mobile Service (MS), and FSS (Earth-to-space). This action is consistent with the waiver granted for the Intelsat 8 at the 166.0° E.L. orbital location. PanAmSat Licensee Corp., *Order and Authorization*, 21 FCC Rcd 36 (Sat. Div. 2006)(*PAS-5 Order*).¹ Limited waiver of the U.S. Table of Allocations is justified in the unique circumstances presented here. Specifically, Intelsat's proposed operations will have a large orbital separation from any other satellite operating in this band in ITU Region 2. Further, due to its orbital location, Intelsat 8 has very limited coverage of the United States.² Intelsat 8's operations at 169.0° E.L. orbital location in the 12.25-12.75 GHz frequency band in Region 2 are subject to the following additional condition:

Intelsat's use of the 12.7-12.75 GHz frequency band must accept and not cause

¹ At the time of launch, Intelsat 8 was named PAS-8 for commercial purposes, but PAS-5 for FCC filings. In 2007, Intelsat filed a letter notifying the Commission that it had renamed PAS-8/PAS-5 (Call Sign 2460) as Intelsat 8. *See* Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, dated Jan. 8, 2007, available in File No. SAT-MOD-20060228-00017.

² *See* Comments of DIRECTV Enterprises, LLC, at 2 (filed August 20, 2012).

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interference to existing television pickup stations and Cable Television Relay Station (“CARS”) band users or any other users in the band operating in accordance with the U.S. Table of Frequency Allocations. If Intelsat precludes the establishment of a new CARS link due to interference from, or to, Intelsat's downlink in the 12.7-12.75 GHz frequency band, Intelsat shall vacate the band.


4. Intelsat 8's transmissions in the 12.25–12.70 GHz frequency band in ITU Region 2 from the 169° E.L. orbital location must comply with the space-to-Earth power flux density (PFD) limits in Article 21.16 of the ITU Radio Regulations.

5. Intelsat shall inform its customers in Region 2 using the 12.25-12.75 GHz band, in writing, that its operations must cease in the event they cause interference to any other lawfully operating radiocommunication systems in the 12.25-12.75 GHz band. In addition, Intelsat shall inform its customers in Region 2 using the 12.25-12.75 GHz band, in writing, that its operations are on an unprotected basis and are therefore subject to interference from authorized services in the 12.25-12.75 GHz frequency band.

6. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application for regular authority to operate Intelsat 8 at the 169.0° E.L. orbital location (IBFS File No. SAT-MOD-20120619-00100) or its pending application to operate Intelsat 19 at the 166.0° E.L. orbital location (IBFS File No. SAT-MOD-20120628-00107).

7. Any action taken or expense incurred as a result of operations pursuant to this grant of special temporary authority is at Intelsat's own risk.

8. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.

 GRANTED* International Bureau *with conditions	File # <u>SAT-STA-20121105-00191</u>
	Call Sign <u>S2460</u> Grant Date <u>11/28/12</u> (or other identifier)
	Term Dates period of From <u>11/08/12</u> To: <u>60 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
Name: Susan H. Crandall	Phone Number: 202-944-7848
Company: Intelsat Corporation	Fax Number: 202-944-7870
Street: 3400 International Drive, N.W.	E-Mail: susan.crandall@intelsat.com
City: Washington	State: DC
Country: USA	Zipcode: 20008 -3006
Attention: Susan H. Crandall	Relationship: Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number SATAMD2012081500131 or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CRY – Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input checked="" type="radio"/> Extend Expiration Date <input type="radio"/> Other	
6. Temporary Orbit Location	7. Requested Extended Expiration Date 2013-01-06 00:00:00.0

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests an additional 60 days, from November 8, 2012 through January 6, 2013, of the Special Temporary Authority previously granted Intelsat to drift Intelsat 8 (call sign S2460) from 166.0 E.L. to 169.0 E.L. and operate at 169.0 E.L.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

November 5, 2012

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



Re: Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 8 (Call Sign S2460)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days—from November 8, 2012 through January 6, 2013—of the Special Temporary Authority ("STA") previously granted Intelsat to drift Intelsat 8 (call sign S2460) from 166.0° E.L. to 169.0° E.L. and operate at 169.0° E.L.¹ Intelsat 8 is currently operating at 169.0° E.L.²

At 169.0° E.L., Intelsat will continue to utilize the specific TT&C frequencies below:

Uplink:

13998.0 MHz (RHCP)

¹ See *Policy Branch Information; Actions Taken*, Report No. SAT-00896, File No. SAT-STA-20120815-00132 (Sept. 7, 2012) (Public Notice). Intelsat has filed an amendment to its pending application to modify the Intelsat 8 license to seek redeployment and operational authority at 169.0° E.L. rather than 169.1° E.L. See *Policy Branch Information; Satellite Applications Accepted for Filing*, File Nos. SAT-AMD-20120815-00131 (Sept. 7, 2012) and SAT-MOD-20120619-00100 (July 20, 2012) (Public Notice).

² The end of life of Intelsat 8, assuming the drift and station-kept operations, is expected to be May 2019. The January 2014 end of life projection for Intelsat 8 listed in Intelsat's 10-K filing is the estimated end of service life. See *Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934*, For the fiscal year ended December 31, 2011, Intelsat S.A. (Mar. 1, 2012) available at <http://www.intelsat.com/files/investors/financial/2011/Q4-2011-Intelsat-Form10K.pdf>. The service life is a more conservative estimate that may be adjusted subsequently to reflect potential fuel life based on the health of the satellite.

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Downlink:

12747.0 MHz (H)
12748.0 MHz (V)

12747.0 MHz (LHCP)
12748.0 MHz (RHCP)

At 169.0° E.L., Intelsat will continue to use the communications frequencies below:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
12250-12750 MHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to expand customer services at the 169.0° E.L. location. In addition, grant will allow the FCC additional time to process the pending application for permanent authority to operate Intelsat 8 at 169.0° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 8 at 169.0° E.L. in accordance with its coordination agreements governing the location.

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 8 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 8 at 169.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 8 at 169.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Ms. Marlene H. Dortch
November 5, 2012
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Intelsat also requests that the waiver previously granted Intelsat 8 of Section 2.106 with respect to use of the 12250-12750 MHz frequency band on a non-interference, non-protected basis in ITU Region 2 continue to apply at 169.0° E.L.,³

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00896, File No. SAT-STA-20120815-00132 (Sept. 7, 2012) (Public Notice). See also *PanAmSat Licensee Corp. Application for Modification of Authority to Operate the PAS-5 Satellite at the 166° E.L. Orbital Location*, Order and Authorization, DA 06-6, File Nos. SAT-MOD-19980928-00078, SAT-AMD-19990222-00024, SAT-AMD-20020326-00055, SAT-STA-20020705-00097, and SAT-AMD-20051116-00220, 21 FCC Rcd 36, ¶ 1 (Jan. 4, 2006). The Intelsat 8 satellite previously was known as PAS-5.