

November 19, 2012

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



Re: Request for Extension of Special Temporary Authority to  
Drift and Operate Intelsat 10  
Call Sign S2382

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from November 22, 2012 through December 21, 2012—of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 10 (call sign S2382) from 68.5° E.L. to 47.5° E.L., and to operate it at that location in the C- and Ku-bands pursuant to the ITU filings of the German Administration.<sup>2</sup> Intelsat has a pending 180-day STA request to continue drifting the satellite<sup>3</sup> and expects shortly to file an application for modification of the Intelsat 10 license to allow for its permanent operation at 47.5° E.L.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00907, File No. SAT-STA-20120925-00155 (Oct. 26, 2012); Intelsat incorporates herein by reference the description of Europe\*Star Gesellschaft Fur Satellitenkommunikation mbH (“Europe\*Star”), the entity that holds the authorization to operate at 47.5° E.L., set forth on page 2 of its STA request, File No. SAT-STA-20110715-00129.

Intelsat further incorporates by reference the New Slot Usage Agreement between Europe\*Star and PanAmSat Europe, as well as Europe\*Star’s authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC; See *Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

<sup>3</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00908, File No. SAT-STA-20121022-00186 (Nov. 2, 2012) (Public Notice).

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Intelsat 10 currently is drifting to 47.5° E.L. and is expected to be on-station at that location in early January 2013. At 47.5° E.L., Intelsat 10 will be collocated with Intelsat 709.

During the drift of Intelsat 10 from 68.5° E.L. to 47.5° E.L., Intelsat will continue to operate 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:

14000.5 MHz (RHCP)  
14499.5 MHz (H)

Downlink:

12747.5 MHz (H and RHCP)  
12748.5 MHz (H and RHCP)

Once on-station at 47.5° E.L., Intelsat will operate the following Intelsat 10 communications frequencies:

3700-4200 MHz  
5925-6425 MHz

14.0-14.5 GHz  
11.45-11.7 GHz  
12.25-12.75 GHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to meet customer demand at 47.5° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will continue to 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 47.5° E.L., Intelsat will operate the communications payload

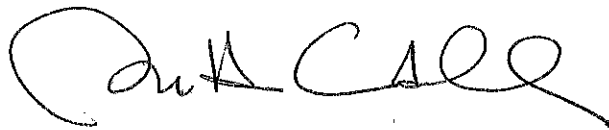
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in conformance with Germany's coordination agreements related to that location or on a non-interference, non-protected basis.

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. Except briefly for Intelsat 709, Intelsat 10 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.<sup>4</sup> 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 10 at 47.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 10 at 47.5° 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

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<sup>4</sup> Intelsat 709 and Intelsat 10 for some period of time will be operated in the same station-keeping box. Intelsat will take all necessary measures to ensure safe station-keeping of Intelsat 709 and Intelsat 10.