

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 7  
Call Sign S2229

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from November 25, 2012 through December 24, 2012—of the Special Temporary Authority ("STA")<sup>1</sup> 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.<sup>2</sup> Intelsat has a pending 180-day STA request to drift and operate the satellite<sup>3</sup> and 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 located at 68.65° E.L.<sup>4</sup>, where it was recently replaced by Intelsat 20.<sup>5</sup> Due to an unexpected delay, the drift of Intelsat 7 to 59.85° E.L. is scheduled to begin on November 23, 2012, with the satellite now expected to be on-station in late December 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

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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-00909, File No. SAT-STA-20120924-00154 (Nov. 2, 2012) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00908, File No. SAT-STA-20121026-00189 (Nov. 2, 2012) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00222, File No. SAT-MOD-20040405-00078 (June 18, 2004) (Public Notice).

<sup>5</sup> 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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industry practices for coordinating TT&C transmissions during the relocation process. 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 extension 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 extension 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.<sup>6</sup>

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<sup>6</sup> 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-

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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

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19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162 (2004). Intelsat 7's location subsequently was changed to 68.65° E.L. *See supra* n.2.