

November 20, 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 Intelsat 5  
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from November 24, 2012 through December 23, 2012— of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to drift Intelsat 5 (call sign S2704) from 169.0° E.L. to 65.45° E.L., where it will eventually operate in the C- and Ku-bands under new U.S. ITU filings.<sup>2</sup> Intelsat has a pending 180-day STA request for this redeployment, which includes a request to extend the Intelsat 5 license term for the duration of this STA extension request.<sup>3</sup> Intelsat also has filed an application for modification of the Intelsat 5 license to allow for its permanent operation at 65.45° E.L.<sup>4</sup> In addition, Intelsat has filed a modification application that includes a request to extend the Intelsat 5 license for a longer term.<sup>5</sup>

Intelsat 5 is currently drifting from 169.0° E.L. to 65.45° E.L. The satellite is expected to be on-station in late May 2013.

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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-20120911-00147 (Oct. 26, 2012) (Public Notice); Intelsat is not herein seeking authority to operate the satellite's communications payload.

<sup>3</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00906, File No. SAT-STA-20121017-00182 (Oct. 26, 2012) (Public Notice).

<sup>4</sup> See *Application of Intelsat License LLC to Modify Authorization of Intelsat 5*, Call Sign S2704, File No. SAT-MOD-20121109-00196 (filed Nov. 9, 2012).

<sup>5</sup> See *Application of Intelsat License LLC to Modify Authorization of Intelsat 5*, Call Sign S2704, File No. SAT-MOD-20121002-00176.

Ms. Marlene H. Dortch

November 20, 2012

Page 2

During the drift of Intelsat 5 from 169.0° E.L. to 65.45° E.L., Intelsat will continue to 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)

Grant of this STA extension 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 November 24, 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.<sup>6</sup>

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 on-station at 65.45° E.L. and subject to FCC approval, Intelsat plans to 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

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<sup>6</sup> See Policy Branch Information; Actions Taken, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008). 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 Association's Blanket Waiver Request Concerning Relieving Satellite Pressure Vessels*, IB Docket No. 02-54, DA 10-2291 (Dec. 14, 2010) (Public Notice).

Ms. Marlene H. Dortch

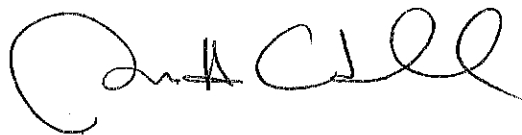
November 20, 2012

Page 3

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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers