

November 26, 2012

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



Re: Request for Special Temporary Authority to De-Orbit the Intelsat 707  
Satellite, Call Sign S2398

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> herein requests Special Temporary Authority (“STA”), beginning on January 10, 2013, and lasting for a period of thirty days, in order to de-orbit the Intelsat 707 satellite (Call Sign S2398) from its current location at 53.0° W.L. and to perform telemetry, tracking and command (“TT&C”) functions with Intelsat 707 during this maneuver.

Grant of this STA is in the public interest. The Intelsat 707 satellite was launched in March 1996 and is nearing the end of its useful life. Accordingly, Intelsat seeks to commence de-orbiting in the first quarter of 2013. The Intelsat 707 satellite is being replaced by the Intelsat 23 satellite (call sign S2831), which was recently launched and is expected to begin commercial service in November 2012.<sup>2</sup> The customers currently receiving services on Intelsat 707 will be transferred to Intelsat 23 at 53.0° W.L. prior to the de-orbit of Intelsat 707.

Intelsat intends to de-orbit the Intelsat 707 satellite to a perigee of at least 150 km above synchronous altitude.<sup>3</sup> This perigee was selected based on Intelsat’s propellant accounting, recent experience with Intelsat 707’s maneuver performance, and calculations of the current fuel situation. All remaining fuel will be used for de-orbiting maneuvers. If there is enough fuel left to do so, the Intelsat 707 satellite will be taken to a perigee higher than 150 km. As a satellite

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<sup>1</sup> 47 C.F.R. § 25.120.

<sup>2</sup> See *Policy Branch Information Actions Taken*, Report No. SAT-00848, DA No. 12-268, File No. SAT-LOA-20110727-00139 (Feb. 24, 2012) (Public Notice).

<sup>3</sup> The Commission has suggested that 150 km above synchronous altitude is acceptable for satellites launched prior to March 18, 2002. See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567, ¶ 82 (2004).

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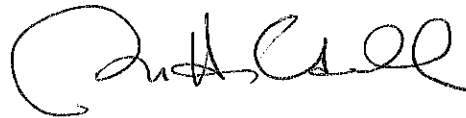
launched prior to March 18, 2002, the minimum perigee requirements for decommissioning set forth in Section 25.283(a) of the Commission's rules do not apply to Intelsat 707.<sup>4</sup>

The de-orbit of Intelsat 707 will not cause any significant risk of harmful interference to other satellites. During the relocation of Intelsat 707, the satellite's communications payload will remain inactive and only the TT&C payload will operate. Intelsat requests authority to operate the following TT&C frequencies during the de-orbit: 3948.0 MHz and 3952.0 (downlink frequencies) and 6173.7 MHz and 6176.3 MHz (uplink frequencies). These frequencies will be coordinated and will operate on a non-interference basis.<sup>5</sup>

Finally, consistent with Section 25.283(c), upon completion of de-orbit maneuvers, all stored energy sources will be discharged by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures.<sup>6</sup>

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request for special temporary authority to de-orbit the Intelsat 707 satellite.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

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<sup>4</sup> 47 C.F.R. § 25.283(d).

<sup>5</sup> See 47 C.F.R. § 25.283(b).

<sup>6</sup> 47 C.F.R. § 25.283(c).