

November 30, 2012

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



Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of the Intelsat 27 C- and Ku-band Payloads (File No. SAT-LOA-20110610-00105)  
Call Sign S2827

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days, from February 17, 2013 through March 18, 2013, to conduct in-orbit testing ("IOT") of the C- and Ku-band payloads of the Intelsat 27 satellite (Call Sign S2827) at 51.5° W.L. in the bands 3700-4200 MHz (downlink), 5925-6425 MHz (uplink), 11450-11700 MHz, 11700-12200 MHz (downlink), 12500-12750 MHz, and 14000-14500 MHz (uplink), and to drift the satellite to its permanent location of 55.5° W.L.<sup>2</sup> Intelsat 27 currently is scheduled to be launched on January 30, 2013. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 27 at 51.5° W.L., Intelsat will operate in the above referenced C- and Ku-bands.<sup>3</sup> To Intelsat's knowledge, the only co-frequency satellites within plus/minus six degrees of 51.5° W.L. are Intelsat 707 at 53.0° W.L., Intelsat 23 at 53.0° W.L., Intelsat 805 at 55.5° W.L., Galaxy 11 at 55.5° W.L., Intelsat 1R at 50.0° W.L., NSS 703 at 47.05° W.L., TDRS 3 at 49.0° W.L., and Inmarsat 3-F4 at 54.0° W.L. Intelsat currently is in coordination discussions with SES World Skies, the operator of NSS 703; Inmarsat, the operator of Inmarsat 3-F4; and the United States Government, the

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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-00904, File No. SAT-LOA-20110610-00105 (Oct. 12, 2012) (Public Notice). During the drift from 51.5° W.L. to 55.5° W.L., only the satellite's TT&C frequencies will be utilized. The TT&C frequencies are: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, and 3702.75 MHz (space-to-Earth), and 5925.5 MHz and 6424.5 MHz (Earth-to-space).

<sup>3</sup> Intelsat will file a separate request for Special Temporary Authority to test the Intelsat 27 UHF payload at the satellite's permanent orbital location of 55.5° W.L.

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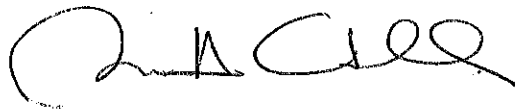
operator of TDRS 3, regarding the Intelsat 27 C/Ku-band IOT. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 during in-orbit testing at 51.5° W.L. Intelsat 27 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 27. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 27 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 27's C- and Ku-band payloads at 51.5° W.L. is a critical step in ensuring that the satellite will be fully operational at 55.5° W.L. This, in turn, will ensure continuity of service to customers at the 55.5° W.L. location, and thereby promotes the public interest.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel

Intelsat Corporation

cc: Robert Nelson  
Kathryn Medley  
Stephen Duall  
Jay Whaley  
Cindy Spiers