

December 11, 2012

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



Re: Request for Extension of Special Temporary Authority to
Drift and Operate Intelsat 702
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 60-day extension -- from December 19, 2012 through February 16, 2013 -- of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Intelsat 702 (call sign S2388) from 47.5° E.L. to 33.0° E.L. and to operate it at that location in inclined orbit in the C- and Ku-bands.² Intelsat has a pending application for modification of the Intelsat 702 license to allow for the satellite’s permanent operation at 33.0° E.L.³

Intelsat 702 currently is operating at 33.0° E.L. It is collocated with Intelsat New Dawn (call sign S2751), which currently operates at 32.8° E.L.⁴

The Intelsat 702 TT&C frequencies are as follows:

Uplink:

6173.7 MHz and 6176.3 (LHCP)

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00905, File No. SAT-STA-20121001-00164 (Oct. 19, 2012) (Public Notice).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00910, File No. SAT-MOD-20121001-00163 (Nov. 9, 2012) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-MOD-20101029-00228 (Apr. 1, 2011) (Public Notice).

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Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)
3952.5 MHz and 3952.0 MHz (RHCP)

The Intelsat 702 communications frequencies are as follows:

Uplink:

5925-6425 MHz
14000-14500 MHz

Downlink:

3700-4200 MHz
10950-11200 MHz
11450-11700 MHz
12500-12750 MHz⁵

Grant of this STA extension request is in the public interest because it will allow Intelsat to maximize the efficient use of its satellite fleet while bringing additional capacity to Europe, Africa and Asia.

Grant of this STA extension request will not result in increased risk of harmful interference. While on-station at 33.0° E.L., Intelsat will operate the communications payload in conformance with Intelsat's coordination agreements related to that location and the FCC's rules governing operations at the location vis-à-vis adjacent locations.

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 702 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 702 at 33.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 33.0° E.L.


⁵ Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 33.0° E.L. orbital location.

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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 extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers