

December 11, 2012

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



Re: Request for Special Temporary Authority to Drift and Operate Intelsat
701
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days, commencing February 18, 2013, to drift Intelsat 701 (call sign S2400) from 157.0° E.L. to 330.5° E.L. and to operate at 330.5° E.L. in the C- and Ku-bands. Intelsat intends shortly to file a modification application seeking permanent authority for this redeployment.

Intelsat 701 is currently operating at 157.0° E.L. pursuant to STA.² Following receipt of FCC approval, Intelsat 701 will be relocated to 330.5° E.L.³ It is

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00914, File No. SAT-STA-20121107-00194 (Nov. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00909, File No. SAT-STA-20121008-00180 (Nov. 2, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00902, File No. SAT-STA-20120910-00145 (Sept. 28, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00890, File No. SAT-STA-20120809-00126 (Aug. 17, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00884, File No. SAT-STA-20120710-00112 (July 20, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00877, File No. SAT-STA-20120612-00096 (June 22, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00873, File No. SAT-STA-20120511-00084 (June 8, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00863, File No. SAT-STA-20120413-00067 (Apr. 27, 2012) (Public Notice); Report No. SAT-00856; File No. SAT-STA-20120312-00039 (Mar. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00846, File No. SAT-STA-20120209-00015 (Feb. 17, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-STA-20120113-00006 (Feb. 3, 2012) (Public Notice); *Policy Branch Information; Actions Taken*,

expected to be on-station at that location in late September 2013 and is expected to operate there until it is de-orbited in 2018. During the drift of Intelsat 701 from 157.0° E.L. to 330.5° E.L., Intelsat will operate only the satellite's TT&C frequencies and will coordinate the drift with potentially affected operators.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

Downlink:

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

Once on-station at 330.5° E.L., Intelsat will operate the following communications frequencies:

Report No. SAT-00831, File No. SAT-STA-20111213-00238 (Dec. 23, 2011) (Public Notice).

³ Intelsat 701 will not depart 157.0° E.L. until Intelsat 706, which currently is drifting, arrives at that location. *See Policy Branch Information; Actions Taken*, Report No. SAT-00914, File No. SAT-STA-20121107-00193 (Nov. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00909, File No. SAT-STA-20121008-00179 (Nov. 2, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00902, File No. SAT-STA-20120910-00146 (Public Notice) (Sep. 28, 2012); *Policy Branch Information; Actions Taken*, Report No. SAT-00890, File No. SAT-STA-20120809-00126 (Public Notice) (Aug. 17, 2012) (Public Notice); *See Policy Branch Information; Actions Taken*, Report No. SAT-00890, File No. SAT-STA-20120809-00126 (Aug. 17, 2012) (Public Notice). Intelsat has a pending permanent license modification application seeking operational authority for Intelsat 706 at 157.0° E.L. *See Intelsat License LLC Application to Modify License*, File No. SAT- STA-MOD-20121026-00188 (filed October 26, 2012).

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
10950 – 11200 MHz
11450 – 11700 MHz
11700 – 11950 MHz
12500 – 12750 GHz

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service to customers at 330.5° E.L., where Intelsat 801 (call sign S2391) currently operates. Intelsat 801 is expected to be de-orbited in late 2013. As Intelsat previously has explained, Intelsat had planned to redeploy Intelsat 707 (call sign S2398) from 307.0° E.L. to 330.5° E.L. to ensure service continuity at the latter location. However, given the failure of the Proton rocket in August 2012, the launch of Intelsat 23 (call sign S2831), which replaced Intelsat 707 at 307.0° E.L., was delayed. As a result, Intelsat 707 does not have sufficient fuel to be redeployed to 330.5° E.L. as planned. Accordingly, Intelsat intends to redeploy Intelsat 701 to 330.5° E.L. in order to ensure service continuity at that location. Once Intelsat 701 is relocated to 330.5° E.L., customers will be transferred from Intelsat 801 to Intelsat 701.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Intelsat 701 at 330.5° E.L. in accordance with Intelsat's coordination agreements related to the location.

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. Except briefly for Intelsat 801, Intelsat 701 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 701 at 330.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 330.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 330.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.⁴

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

⁴ See *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), *recon. denied*, 15 FCC Rcd 25234 (2000).