

S2400 SAT-STA-20121211-00216 IB2012002839
Intelsat License LLC
Intelsat 701



File # SAT-STA-20121211-00216

Call Sign S2400 Grant Date 04/04/13
(or other identifier)

Term Dates period of
From 04/04/13 To: 180 days

Approved by OMB
3060-0678

Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

*with conditions

Date & Time Filed: Dec 11 2012 4:33:16:540PM
File Number: SAT-STA-20121211-00216
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority to Drift and Operate Intelsat 701, Call Sign S2400

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Intelsat License LLC
IBFS File No. SAT–STA–20121211–00216
Call Sign S2400

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–20121211–00216, as supplemented, is GRANTED. Specifically, Intelsat is authorized, for a period of 180 days, commencing on April 4, 2013, to continue to perform Telemetry, Tracking, and Command (TT&C) operations with the Intelsat 701 space station (Call Sign S2400) necessary to drift the space station from the 157.0° E.L. orbital location to the 29.5° W.L. orbital location using the following center frequencies: 6173.7 MHz and 6176.3 MHz (Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (space-to-Earth).¹ Operations under this authorization must be in accordance with the terms and conditions contained in Intelsat’s application and the Federal Communications Commission’s rules not waived herein, and are subject to the following conditions:

1. All operations under this grant of special temporary authority must be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating radiocommunication system.
2. In the event of any harmful interference as a result of the operations under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference and must immediately inform the Commission, in writing, of such an event.
3. Intelsat must coordinate the operations of Intelsat 701 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 29.5° W.L. orbital location.
4. Intelsat must operate only the TT&C frequencies on Intelsat 701 during the space station’s drift from the 157.0° E.L. orbital location to the 29.5° W.L. orbital location.
5. Grant of this authorization does not constitute “specific authority” pursuant to 25.161(c) of the Commission’s rules.
6. This grant of special temporary authority is without prejudice to any decision with respect to any replacement expectancy at the 157.0° E.L. orbital location in the 3625-3700 MHz, 5850-5925 MHz, and 11.7-11.95 GHz frequency bands.²
7. Any action taken or expense incurred as a result of operations pursuant to this grant of special temporary authority is at Intelsat’s own risk.


¹ Although Intelsat originally sought both drift and operational authority in the instant application, Intelsat now indicates that it will accept grant of drift-only authority for Intelsat 701. *See* Letter from Jennifer D. Hindin, Counsel for Intelsat License LLC, to Marlene H. Dortch, Secretary, FCC, dated February 4, 2013. Intelsat was previously granted special temporary authority for 30 days to conduct TT&C operations necessary to start the drift of Intelsat 701 from 157.0° E.L. to 330.5° E.L. *See* IBFS File No. SAT–STA–20130204–00015 (granted Feb. 15, 2013).

² Intelsat notified the Commission that Intelsat 701 left the 157.0° E.L. station-keeping box on February 20, 2013. *See* Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, dated Feb. 21, 2013, available in IBFS File No. SAT–STA–20130204–00015. As a result of this departure, Intelsat is not operating, nor has Intelsat indicated any intent to operate, another space station at 157.0° E.L. using the 3625-3700 MHz, 5850-5925 MHz, and 11.7-11.95 GHz frequency bands that were previously authorized for use by Intelsat at that location. *See, e.g.* IBFS File Nos. SAT-MOD-20070511-00071 (granted July 20, 2007) and SAT-STA-20130204-00014 (granted February 14, 2013).

Intelsat License LLC
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8. Intelsat is afforded 30 days from the date of release of this authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

9. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

 GRANTED* International Bureau *with conditions	File # <u>SAT-STA-20121211-00216</u>
	Call Sign <u>S2400</u> Grant Date <u>04/04/13</u> (or other identifier)
	Term Dates period of From <u>04/04/13</u> To: <u>180 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact

Name:	Susan H Crandall	Phone Number:	202-944-7848
Company:	Intelsat Corporation	Fax Number:	202-944-7870
Street:	3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall	Relationship:	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location Extend Expiration Date Other

6. Temporary Orbit Location

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests Special Temporary Authority 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.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

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*,

Ms. Marlene H. Dortch
December 11, 2012
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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.

Ms. Marlene H. Dortch
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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).



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February 4, 2013

Jennifer D. Hindin
202.719.4975
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VIA IBFS

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat 701; File No. SAT-STA-20121211-00216; Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), by its counsel, hereby supplements the above-referenced pending request for Special Temporary Authority ("STA") for 180 days 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. Specifically, Intelsat would accept grant of authority for the satellite drift only using the following TT&C frequencies:

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)

Intelsat expects the Intelsat 701 satellite to arrive at the 330.5° E.L. orbital location on September 30, 2013.



Marlene H. Dortch
February 4, 2013
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Please contact the undersigned with any questions.

Respectfully Submitted,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel for Intelsat License LLC