

January 2, 2013

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 Drift Galaxy 11 to, and Operate at, 55.6° W.L. (304.4° E.L.); Call Sign: S2253

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days -- from January 15, 2013 through February 13, 2013 -- to drift Galaxy 11 (S2253) from 55.5° W.L. to 55.6° W.L. and operate the satellite temporarily at 55.6° W.L. prior to permanently relocating the satellite to 44.8° W.L.<sup>2</sup> During the drift to 55.6° W.L. and at that location, Intelsat will continue to operate Galaxy 11 in the 13750 – 14500 MHz, 10950 – 11200 MHz and 11700 – 12200 MHz frequency bands and will provide TT&C using the 14000.5 MHz, 14498.5 MHz, 11701 MHz, and 11702 MHz frequencies. Intelsat seeks this STA in order to ensure safe station-keeping of three Intelsat satellites that will be collocated at the nominal 55.5° W.L. location following the launch of Intelsat 27 at the end of January.

Intelsat currently operates Galaxy 11 and Intelsat 805 at 55.5° W.L.<sup>3</sup> Intelsat 27 is scheduled to be launched on January 30, 2013 and will be operated at 55.5° W.L.<sup>4</sup> In order to ensure the safe station-keeping of the three satellites, Intelsat

---

<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> Intelsat has a pending application to modify the license for Galaxy 11 to allow it to be redeployed to 44.8° W.L. in May 2013. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00918, File No. SAT-MOD-20121018-00184 (Dec. 14, 2012) (Public Notice).

<sup>3</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00764, File No. SAT-MOD-20101102-00229 (Mar. 11, 2011) (Public Notice) and *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

<sup>4</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00904, File No. SAT-LOA-20110610-00105 (Oct. 12, 2012) (Public Notice).

seeks authority to move Galaxy 11 to 55.6° W.L. until May 2013.<sup>5</sup> As noted above, Galaxy 11 will be drifted to 55.6° W.L. with its communications payload operating. The drift will take approximately one week.

Intelsat will operate Galaxy 11 at 55.6° W.L. in accordance with Intelsat's coordination agreements concerning the nominal 55.5° W.L. location. The only co-frequency satellites located within plus or minus three degrees of 55.6° W.L. are Intelsat satellites.

The drift will be coordinated internally 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 collisions with large debris or other operational space stations. Galaxy 11 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 Galaxy 11 at 55.6° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 11 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Galaxy 11 at 55.6° W.L. will help to ensure the safe station-keeping of the three Intelsat satellites at the nominal 55.5° W.L. location and will not impact the Galaxy 11 customers. Accordingly, grant of this STA request is in the public interest.

---

<sup>5</sup> Intelsat is concurrently filing a request to operate Galaxy 11 at 55.6° W.L. for 180 days, which will cover the time period until the satellite is moved to 44.8° W.L.

Ms. Marlene H. Dortch  
January 2, 2013  
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers