

January 2, 2013

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



Re: Request for Further Extension of Special Temporary Authority to Drift and Operate Intelsat 8 (Call Sign S2460)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days—from January 7, 2013 through March 5, 2013—of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 8 (call sign S2460) from 166.0° E.L. to 169.0° E.L. and operate at 169.0° E.L.² Intelsat 8 is currently operating at 169.0° E.L.³

At 169.0° E.L., Intelsat will continue to utilize the specific TT&C frequencies below:

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

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00914, File No. SAT-STA-20121105-00191 (Nov. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00896, File No. SAT-STA-20120815-00132 (Sept. 7, 2012) (Public Notice). Intelsat has filed an amendment to its pending application to modify the Intelsat 8 license to seek redeployment and operational authority at 169.0° E.L. rather than 169.1° E.L. See *Policy Branch Information; Satellite Applications Accepted for Filing*, File Nos. SAT-AMD-20120815-00131 (Sept. 7, 2012) and SAT-MOD-20120619-00100 (July 20, 2012) (Public Notice).

³ The end of life of Intelsat 8, assuming the drift and station-kept operations, is expected to be May 2019. The January 2014 end of life projection for Intelsat 8 listed in Intelsat's 10-K filing is the estimated end of service life. See *Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934*, For the fiscal year ended December 31, 2011, Intelsat S.A. (Mar. 1, 2012) available at <http://www.intelsat.com/files/investors/financial/2011/Q4-2011-Intelsat-Form10K.pdf>. The service life is a more conservative estimate that may be adjusted subsequently to reflect potential fuel life based on the health of the satellite.

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Uplink:

13998.0 MHz (RHCP)

Downlink:

12747.0 MHz (H)

12748.0 MHz (V)

12747.0 MHz (LHCP)

12748.0 MHz (RHCP)

At 169.0° E.L, Intelsat will continue to use the communications frequencies below:

Uplink:

5925 – 6425 MHz

14000 – 14500 MHz

Downlink:

3700 – 4200 MHz

12250-12750 MHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to expand customer services at the 169.0° E.L. location. In addition, grant will allow the FCC additional time to process the pending application for permanent authority to operate Intelsat 8 at 169.0° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 8 at 169.0° E.L. in accordance with its coordination agreements governing 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. Intelsat 8 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 8 at 169.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-


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keeping volume with Intelsat 8 at 169.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the waiver previously granted Intelsat 8 of Section 2.106 with respect to use of the 12250-12750 MHz frequency band on a non-interference, non-protected basis in ITU Region 2 continue to apply at 169.0° E.L.⁴

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

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00896, File No. SAT-STA-20120815-00132 (Sept. 7, 2012) (Public Notice). See also *PanAmSat Licensee Corp. Application for Modification of Authority to Operate the PAS-5 Satellite at the 166° E.L. Orbital Location*, Order and Authorization, DA 06-6, File Nos. SAT-MOD-19980928-00078, SAT-AMD-19990222-00024, SAT-AMD-20020326-00055, SAT-STA-20020705-00097, and SAT-AMD-20051116-00220, 21 FCC Rcd 36, ¶ 1 (Jan. 4, 2006). The Intelsat 8 satellite previously was known as PAS-5.