

January 24, 2013

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



Re: Request for Special Temporary Authority to Conduct In-Orbit
Testing of the Intelsat 27 UHF-band Payload (File No. SAT-LOA-
20110610-00105)
Call Sign S2827

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from March 15, 2013 through April 13, 2013, to conduct in-orbit testing ("IOT") of the UHF-band payload of the Intelsat 27 satellite (Call Sign S2827) at the satellite's permanent location of 55.5° W.L.² in the following channels/frequencies:

CHANNEL 3: M252.355 DL M293.355 UL 5kHz BW
CHANNEL 4: M252.365 DL M293.365 UL 5kHz BW
CHANNEL 5: M252.375 DL M293.375 UL 5kHz BW
CHANNEL 6: M252.385 DL M293.385 UL 5kHz BW
CHANNEL 12: M258.050 DL M299.050 UL 25kHz BW
CHANNEL 13: M258.875 DL M299.875 UL 25kHz BW

Intelsat 27 currently is scheduled to be launched on January 30, 2013. In support of its request, Intelsat submits the following information.

During in-orbit testing of the Intelsat 27 UHF-band payload at 55.5° W.L., Intelsat will operate in UHF only in the above referenced

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-00904, File No. SAT-LOA-20110610-00105 (Oct. 12, 2012) (Public Notice). The FCC's order granting the Intelsat 27 license prohibits Intelsat from operating the UHF payload without further order from the FCC. See *id.*, Condition # 4. Intelsat is concurrently filing an STA request seeking authority to utilize an earth station located in Hagerstown, Maryland to communicate with Intelsat 27 in the UHF channels/frequencies identified herein for IOT purposes.

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channels/frequencies.³ Intelsat will transmit to the satellite using an earth station located at Intelsat's Hagerstown, Maryland teleport.⁴ The U.S. Department of Defense will be able to monitor and, if need be, instruct Intelsat to cease IOT transmissions in the event of interference with U.S. Government operations. Intelsat provides the following 24-hour stop buzzer point of contact for the Intelsat 27 UHF payload IOT.

Name: Gerry Jansson
Telephone No.: +1.202. 957.0146

Intelsat would agree to the following conditions being included in a grant of the STA requested herein:

1. The STA is only to be used to support the IOT testing of the UHF payload on the satellite.
2. Any use of this UHF capability after the IOT testing period requires the filing of an application for modification of license and affirmative authorization and/or consent of the FCC.
3. The testing of the Intelsat 27 UHF payload shall be on a non-protected/non-interference basis.

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 during in-orbit testing at 55.5° W.L. Except briefly for Intelsat 805, Intelsat 27 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.⁵ 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 27. Finally, Intelsat is not aware of any system with an

³ Intelsat has filed a separate request for Special Temporary Authority to test the Intelsat 27 UHF C- and Ku-band payloads at 51.5° W.L. See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20121130-00204 (filed Nov. 30, 2012).

⁴ See *supra* n. 2.

⁵ Intelsat 805 currently operates at 55.5° W.L. Intelsat is relocating Galaxy 11, which recently also operated at 55.5° W.L., temporarily to 55.6° W.L. See *Policy Branch Information, Actions Taken*, Report No. SAT-00925, File Number SAT-STA-20130102-00002 (Jan. 18, 2013) (Public Notice). That relocation will be completed prior to Intelsat 27's arrival on-station. Following traffic transfer to Intelsat 27, Intelsat 805 also will be relocated.

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overlapping station-keeping volume with Intelsat 27 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 27's UHF-band payload at 55.5° W.L. is a critical step in ensuring that the UHF payload will be fully operational. This, in turn and subject to FCC further approval, will make UHF capacity available to customers at the 55.5° W.L. location, and thereby promotes the public interest.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Robert Nelson
Ed Davison
Kathryn Medley
Stephen Duall
Jay Whaley
Cindy Spiers