

February 4, 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 Operate Intelsat 701
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a 30-day further extension – through March 12, 2013 – of the Special Temporary Authority ("STA")¹ previously granted Intelsat to stop the drift of Intelsat 701 (call sign S2400) and operate the satellite at 157.0° E.L. in the C- and Ku-bands in inclined orbit mode.²

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-00928, File No. SAT-STA-20130107-00005 (Feb. 1, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00921, File No. SAT-STA-20121210-00212 (Dec. 21, 2012) (Public Notice); *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

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Intelsat will continue to utilize the following TT&C frequencies on Intelsat 701 at 157.0° E.L.:

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 will continue to utilize the following communications frequencies on Intelsat 701 at 157.0° E.L.:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

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

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

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue to meet customer demand at this location. Intelsat seeks to continue to operate the Intelsat 701 satellite at 157.0° E.L. pursuant to STA because the satellite will be redeployed in the near term in order to preserve service continuity at a different location as a result of a launch delay. Specifically, Intelsat has a pending application requesting authority to redeploy Intelsat 701 to 330.5° E.L. commencing February 18, 2013.³ Intelsat 706 currently is drifting to 157.0° E.L.⁴ and will arrive at the location before Intelsat 701 is redeployed.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 701 at 157.0° E.L. in accordance with any applicable coordination agreements.

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 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

³ See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20121211-00216 (filed Dec. 11, 2012). Given that Intelsat does not yet have FCC approval to begin the drift of Intelsat 701 to 330.5° E.L, Intelsat is herein seeking an additional 30 days to accommodate a possible delay in the satellite's departure from 157.0° E.L.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00921, File No. SAT-STA-20121210-00214 (Dec. 21, 2012) (Public Notice); *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 (Sept. 28, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00890, File No. SAT-STA-20120810-00127 (Public Notice) (Aug. 17, 2012) (Public Notice).

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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 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 157.0° E.L. location, namely, the waivers of Sections 25.140(b)(2), 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.⁵

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Kathryn Medley
Cindy Spiers

⁵ 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).