February 6, 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 Intelsat 706 and Request to Begin Operations
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—through March 12, 2013—of the Special Temporary Authority ("STA")[1] originally granted Intelsat to drift Intelsat 706 (call sign S2401) from 72.0° E.L. to 157.0° E.L.[2] In addition, Intelsat seeks temporary authority to begin operating Intelsat 706 at 157.0º E.L. in the C- and Ku-bands in inclined orbit.[3] Intelsat has a pending application for permanent authority to operate Intelsat 706 at 157.0º E.L.[4]

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[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-20130107-00004 (Feb. 1, 2013)*; Policy Branch Information; Actions Taken*, Report No. SAT-00921, File No. SAT-STA-20121210-00214 (Dec. 21, 2012) (Public Notice); *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).

[3] Intelsat 706 began operating in inclined orbit mode in 2011. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

[4] *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00915, File No. SAT-MOD-20121026-00188 (Nov. 30, 2012) (Public Notice).

As explained below and in the original STA request, Intelsat 706 is being redeployed to 157.0° E.L. on an emergency basis, in order to free up Intelsat 701 to move to 330.5° E.L. to ensure traffic continuity at 330.5° E.L. in light of the delayed launch of Intelsat 23. Intelsat currently expects to operate Intelsat 706 at 157.0° E.L. until the satellite is de-orbited in the second half of 2014.

Intelsat 706 currently is on-station at 157.0° E.L., operating only TT&C frequencies. Traffic transfer from Intelsat 701 to Intelsat 706 is scheduled to begin on February 14, 2013.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

At 157.0° E.L. Intelsat will operate Intelsat 706 in the following communications frequencies:

3700 – 4200 MHz (space-to-Earth)
5925 – 6425 MHz (Earth-to-space)
10950 – 11200 MHz (space-to-Earth)
11450 – 11700 MHz (space-to-Earth)
12500 – 12750 MHz (space-to-Earth)
14000 – 14500 MHz (Earth-to-space)

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue the redeployment process necessary to ensure continuity of service at 330.5° E.L., where Intelsat 801 (call sign S2391) currently operates. Given the failure of the

Proton rocket in August 2012, the launch of Intelsat 23 (call sign S2831), which replaced Intelsat 707 (call sign S2398) at 307.0° E.L., was delayed. As a result, Intelsat 707 did not have sufficient fuel to be redeployed to 330.5° E.L. as planned. Accordingly, Intelsat decided to redeploy Intelsat 701, which currently operates at 157.0° E.L., to 330.5° E.L. in order to ensure service continuity at the latter location. Intelsat 706 is being redeployed in order to free up Intelsat 701 to move to 330.5° E.L.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will operate at 157.0° E.L. in conformance with its coordination agreements for the location.

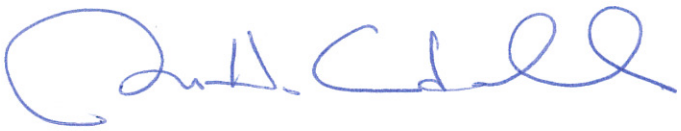
Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. Except briefly while collocated with Intelsat 701, Intelsat 706 will not be located at the same orbital location as another 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 706 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 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 706 spacecraft continue to apply at the 157.0° 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.[5]

[5] *See 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).

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Stephen Duall
Jay Whaley
Cindy Spiers