

February 11, 2013

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



Re: Request for Extension of 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 a 30-day extension -- from February 14, 2013 through March 15, 2013 -- of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat 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> Galaxy 11 currently is located at 55.6° W.L.

Intelsat will continue to 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.

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.

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<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> See *Policy Branch Information; Actions Taken*, Report No. SAT-00925, File No. SAT-STA-20130102-00002 (Jan. 18, 2013) (Public Notice). 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).

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

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers