

May 15, 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 5 and Request to Operate
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from May 21, 2013 through June 19, 2013—of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 5 (call sign S2704) from 169.0° E.L. to 65.45° E.L.² In addition, because the satellite shortly will arrive on-station, Intelsat seeks temporary authority to begin operating Intelsat 5 at 65.45° E.L. in the C- and Ku-bands under new U.S. ITU filings. Intelsat has a pending 180-day STA request for this redeployment, which includes a request to extend the Intelsat 5 license term for the duration of this STA further extension request.³ Intelsat also has filed an application for modification of the

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-00945, File No. SAT-STA-20130412-00059 (Apr. 26, 2013) (Public Notice); *Actions Taken*, Report No. SAT-00941, File No. SAT-STA-20130318-00033 (Apr. 5, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00934, File No. SAT-STA-20130214-00022 (Mar. 1, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00928, File No. SAT-STA-20130116-00008 (Feb. 1, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00928, File No. SAT-STA-20121218-00218 (Feb. 1, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00914, File No. SAT-STA-20121120-00201 (Nov. 30, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00907, File No. SAT-STA-20120911-00147 (Oct. 26, 2012) (Public Notice).

³ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00906, File No. SAT-STA-20121017-00182 (Oct. 26, 2012) (Public Notice).

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Intelsat 5 license to allow for its permanent operation at 65.45° E.L.⁴ In addition, Intelsat has filed a modification application that includes a request to extend the Intelsat 5 license for a longer term.⁵

Intelsat 5 is currently drifting from 169.0° E.L. to 65.45° E.L. The satellite is expected to be on-station in late May 2013.

During the drift of Intelsat 5 from 169.0° E.L. to 65.45° E.L., Intelsat will continue to utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

14498 MHz (H)
13999 MHz (RHCP)

Downlink:

11451 MHz (H, V and RHCP)
11452 MHz (H, V and RHCP)
11454 MHz (RHCP and LHCP)

Once located at 65.45° E.L., Intelsat also will operate the satellite's communications frequencies as set forth below:

Uplink:

5925-6425 MHz
12750-13250 MHz
14000-14250 MHz

⁴ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00937, File No. SAT-MOD-20121109-00196 (Mar. 15, 2013) (Public Notice).

⁵ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00937, File No. SAT-MOD-20121002-00176 (Mar. 15, 2013) (Public Notice).

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Downlink:

3700-4200 MHz

10700-10950 MHz

11200-11450 MHz

11450-11700 MHz

Grant of this STA further extension request is in the public interest because it will allow Intelsat to meet anticipated customer demand at 65.45° E.L. Continued operation of the Intelsat 5 satellite beyond its license term of March 21, 2013 also serves the public interest by enabling customers to receive additional services with this in-orbit spacecraft prior to its de-orbit. The FCC has already approved a post-mission disposal plan for the Intelsat 5 satellite that reserves 21.2 kg of fuel for an intended de-orbit of 150 km.⁶

Grant of this STA further extension request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 65.45° E.L. and subject to FCC approval, Intelsat will operate the communications payload in conformance with its coordination agreements related to that location or on a non-interference, non-protected 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. Intelsat 5 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 5 at 65.45° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 65.45° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁶ See Policy Branch Information; Actions Taken, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008). Intelsat notes that the Satellite Industry Association's pending request for blanket waiver of Section 25.283(c) incorrectly included the Intelsat 5 satellite. *Pleading Cycle Established for Comment on Satellite Industry Association's Blanket Waiver Request Concerning Relieving Satellite Pressure Vessels*, IB Docket No. 02-54, DA 10-2291 (Dec. 14, 2010) (Public Notice).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this further extension request, including authority to operate the satellite's communication payload at 65.45° E.L.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers