

July 15, 2013

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



Re: Request for Special Temporary Authority to Drift Intelsat 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days—from July 30, 2013 through August 28, 2013—to drift Intelsat 5 (call sign S2704) from 65.45° E.L. to 50.15° E.L., where it will eventually operate in inclined orbit in the C- and Ku-bands in accordance with the ITU filings of Turkey.² Intelsat also seeks to extend the Intelsat 5 license term, which has been extended via prior STA,³ for the duration of this STA request. Intelsat has a pending application to modify the Intelsat 5 license to extend the satellite's license for a longer term.⁴

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 Intelsat is not herein seeking authority to operate the satellite's communications payload. Intelsat will shortly file an STA seeking full operational authority once the satellite is on-station. Attached herewith as Exhibit A is a letter from Türksat Satellite Communication, Cable TV and Operation A.S. ("Türksat") dated July 12, 2013 confirming that Türksat has informed the Government of Turkey that Intelsat 5 will operate at the nominal 50.0° E.L. under United States licensing authority. Intelsat begin operating Intelsat 5 in inclined orbit in 2012. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2704 (Oct. 24, 2012).

³ *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00937, File No. SAT-STA-20121017-00182 (May 31, 2013) (Public Notice).

⁴ Intelsat is seeking permanently to extend the Intelsat 5 license through December 31, 2020. *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).

Ms. Marlene H. Dortch
July 15, 2013
Page 2

Intelsat 5 currently is operating at 65.45° E.L.⁵ Subject to receipt of FCC approval, Intelsat 5 will be relocated temporarily to 50.15° E.L.—with the drift starting July 30, 2013 and the satellite on-station in late August 2013.

During the drift of Intelsat 5 from 65.45° E.L. to 50.15° E.L., Intelsat will 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)

Grant of this STA request is in the public interest because it will allow Intelsat to meet a customer's demand for temporary service at 50.15° E.L.⁶ Continued operation of the Intelsat 5 satellite beyond its original license term also serves the public interest by enabling customers to receive additional services from 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.⁷

⁵ See *supra* n.3. Intelsat has a pending application for permanent authority to operate at 65.45° E.L. 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). Intelsat expects shortly to amend that application to seek authority to operate the satellite at a different location on a permanent basis.

⁶ Intelsat currently expects to operate Intelsat 5 at 50.15° E.L. through the first or second quarter of 2014, when Turksat-4B is expected to be launched to the nominal location.

⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008) (Public Notice). Intelsat notes that the Satellite Industry Association's pending


Ms. Marlene H. Dortch
July 15, 2013
Page 3

Grant of this STA 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 50.15° E.L., and subject to FCC approval, Intelsat plans to operate the communications payload in conformance with Turkey's 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 50.15° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 50.15° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

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).