

July 17, 2013

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



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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 180 days commencing August 27, 2013 to operate Intelsat 5 (call sign S2704) temporarily at 50.15° E.L. in inclined orbit in the C- and Ku-bands in accordance with the ITU filings of Turkey.<sup>2</sup> Intelsat has a pending application to modify the Intelsat 5 license to extend the satellite's license term and understands that grant of this STA request would be without prejudice to any action on that application.<sup>3</sup>

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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> Intelsat has a pending 30-day STA request for authority to start drifting Intelsat 5 to 50.15° E.L. See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20130715-00092 (filed July 15, 2013). Intelsat incorporates herein by reference the letter attached as Exhibit A to that STA request 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 has been operating Intelsat 5 at 65.45° E.L. under STA. 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) ("65.45° E.L. STA").

<sup>3</sup> 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).

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As noted above, Intelsat 5 currently is operating at 65.45° E.L.<sup>4</sup> Subject to receipt of FCC approval,<sup>5</sup> Intelsat 5 will be relocated to 50.15° E.L. -- with the drift starting July 30, 2013 and the satellite on-station in late August 2013. Intelsat expects Intelsat 5 to operate 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.

At the 50.15° E.L. location, Intelsat will utilize the following TT&C frequencies on Intelsat 5:

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)

At the 50.15° E.L. location, Intelsat also will operate the following communications frequencies on Intelsat 5:

Uplink:

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

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<sup>4</sup> See 65.45° E.L. STA. 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.

<sup>5</sup> See *supra* n.2.

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Downlink:

3700-4200 MHz  
10700-10950 MHz  
11200-11450 MHz  
11450-11700 MHz

Grant of this STA request is in the public interest because it will allow Intelsat to meet customer demand for temporary service at 50.15° E.L. It 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.<sup>6</sup>

Grant of this STA request will not result in increased risk of harmful interference. At 50.15° E.L., Intelsat will operate the above listed frequencies in accordance 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.

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<sup>6</sup> 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 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 request.

Sincerely,

A handwritten signature in black ink, appearing to read "S.H. Crandall". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers