

August 23, 2013

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



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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from August 29, 2013 through September 28, 2013 — of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 5 (call sign S2704) from 65.45° E.L. to 50.15° E.L.,<sup>2</sup> where it will eventually operate in inclined orbit in the C- and Ku-bands in accordance with the ITU filings of Turkey<sup>3</sup> and to continue operating the TT&C frequencies once the satellite is on-station. 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>4</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> See *Policy Branch Information; Actions Taken*, Report No. SAT-00963, File No. SAT-STA-20130715-00092 (July 26, 2013) (Public Notice).

<sup>3</sup> Intelsat has two pending STA requests seeking full operational authority once the satellite is on-station. See *Intelsat License LLC, Request for Special Temporary Authority to Operate Intelsat 5, Call Sign S2704*, File No. SAT-STA-20130808-00105 (filed Aug. 2, 2013) and *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00964, File No. SAT-STA-20130717-00095 (Aug. 2, 2013) (Public Notice).

<sup>4</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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Intelsat 5 currently is drifting to 50.15° E.L. and will arrive on-station in late August 2013.

During the remaining drift of Intelsat 5 to 50.15° E.L. and once on-station, Intelsat will continue to utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions. 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 extension 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.<sup>5</sup> It 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.<sup>6</sup>

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the

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<sup>5</sup> 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.

<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).

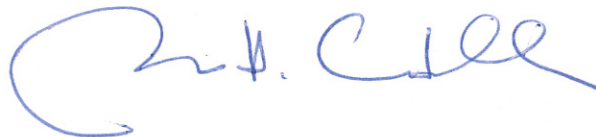
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Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once the satellite is on-station at 50.15° E.L., Intelsat will operate the TT&C frequencies in conformance with Turkey's coordination 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 extension request.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers