

September 25, 2013

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



Re: Request for Extension of Special Temporary Authority to Drift Intelsat 701 and Request to Begin Operations  
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days, commencing October 1, 2013, of the Special Temporary Authority previously granted Intelsat ("STA")<sup>1</sup> to drift Intelsat 701 (call sign S2400) from 157.0° E.L. to 330.5° E.L. (29.5° W.L.).<sup>2</sup> Intelsat herein also seeks temporary authority to begin operating Intelsat 701 at 330.5° E.L. in the C- and Ku-bands once the satellite arrives on-station in mid-October 2013. Intelsat has a pending application seeking permanent authority for this redeployment.<sup>3</sup>

Intelsat 701 currently is drifting, but is scheduled to be on-station at 330.5° E.L. in mid-October 2013. As noted in the original STA request, Intelsat currently expects to operate Intelsat 701 at 330.5° E.L. until it is de-orbited in 2018. During the remaining drift of Intelsat 701 from 157.0° E.L. to 330.5° E.L., Intelsat will continue to operate only the satellite's TT&C frequencies and coordinate the drift with potentially affected operators.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz (LHCP)  
6176.3 MHz (LHCP)

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and a \$860.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00941, File No. SAT-STA-20131211-00216 (Apr. 5, 2013) (Public Notice).

<sup>3</sup> See *Intelsat License LLC Application to Modify Authorization for Intelsat 701*, File No. SAT- SAT-MOD-20130513-00068 (filed May 13, 2013).

Downlink:

3947.5 MHz (RHCP)  
3948.0 MHz (RHCP)

3952.5 MHz (RHCP)  
3952.0 MHz (RHCP)

Once on-station at 330.5° E.L., Intelsat will operate the following communications frequencies:

Uplink:

5925 – 6425 MHz  
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz  
10950 – 11200 MHz  
11450 – 11700 MHz  
11700 – 11950 MHz  
12500 – 12750 GHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to ensure continuity of service to customers at 330.5° E.L., where Intelsat 801 (call sign S2391) currently operates. Intelsat 801 is expected to be de-orbited in late 2013. As Intelsat previously has explained, Intelsat had planned to redeploy Intelsat 707 (call sign S2398) from 307.0° E.L. to 330.5° E.L. to ensure service continuity at the latter location. However, given the failure of the Proton rocket in August 2012, the launch of Intelsat 23 (call sign S2831), which replaced Intelsat 707 at 307.0° E.L., was delayed. As a result, Intelsat 707 did not have sufficient fuel to be redeployed to 330.5° E.L. as planned. Accordingly, Intelsat is redeploying Intelsat 701 to 330.5° E.L. in order to ensure service continuity at that location. Once Intelsat 701 is relocated to 330.5° E.L., customers will be transferred from Intelsat 801 to Intelsat 701.

Grant of this STA extension request will not result in increased risk of harmful interference. Upon receipt of Commission approval, Intelsat will operate

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Intelsat 701 at 330.5° E.L. in accordance with Intelsat's coordination agreements related to the location.

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. Except briefly for Intelsat 801, Intelsat 701 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 701 at 330.5° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 701 at 330.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 330.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.<sup>4</sup>

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

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<sup>4</sup> See *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), *recon. denied*, 15 FCC Rcd 25234 (2000).