

October 17, 2013

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



Re: Request for Further Extension of Special Temporary  
Authority to Drift and Operate Intelsat 702  
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a 60-day further extension -- from October 15, 2013 through December 12, 2013 -- of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to drift Intelsat 702 (call sign S2388) from 47.5° E.L. to 33.0° E.L. and to operate it at that location in inclined orbit in the C- and Ku-bands.<sup>2</sup> Intelsat has a pending application for modification of the Intelsat 702 license to allow for the satellite’s permanent operation at 33.0° E.L.<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> See *Policy Branch Information; Actions Taken*, Report No. SAT-00972, File Nos. SAT-STA-20130808-00104 and SAT-STA-20130607-00080 (Sept. 13, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00945, File No. SAT-STA-20130410-00058 (Apr. 26, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00935, File No. SAT-STA-20130212-00021 (Mar. 8, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00921, File No. SAT-STA-20121211-00215 (Dec. 21, 2012) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00905, File No. SAT-STA-20121001-00164 (Oct. 19, 2012) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00910, File No. SAT-MOD-20121001-00163 (Nov. 9, 2012) (Public Notice).

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Intelsat 702 currently is operating at 33.0° E.L. It is collocated with Intelsat 28 (f/k/a Intelsat New Dawn; call sign S2751), which currently operates at 32.8° E.L.<sup>4</sup>

The Intelsat 702 TT&C frequencies are as follows:

Uplink:

6173.7 MHz and 6176.3 (LHCP)

Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)

3952.5 MHz and 3952.0 MHz (RHCP)

The Intelsat 702 communications frequencies are as follows:

Uplink:

5925-6425 MHz

14000-14500 MHz

Downlink:

3700-4200 MHz

10950-11200 MHz

11450-11700 MHz

12500-12750 MHz<sup>5</sup>

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue serving customers from the 33.0° E.L. orbital location while the Commission processes the application for permanent authority.

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<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00972, File No. SAT-STA-20130808-00104 (Sept. 13, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-MOD-20101029-00228 (Apr. 1, 2011) (Public Notice).

<sup>5</sup> Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 33.0° E.L. orbital location.

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Grant of this STA further extension request will not result in increased risk of harmful interference. While on-station at 33.0° E.L., Intelsat will continue to operate the communications payload in conformance with Intelsat's coordination agreements related to that location and the FCC's rules governing operations at the location vis-à-vis adjacent locations.

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. With the exception of Intelsat 28, Intelsat 702 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 702 at 33.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 33.0° 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 further extension request.

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers