

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 10  
Call Sign S2382

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days—through December 16, 2013—of the Special Temporary Authority (“STA”)<sup>1</sup> originally granted Intelsat to drift Intelsat 10 (call sign S2382) from 68.5° E.L. to 47.5° E.L., and to operate it at 47.5° E.L. in the C- and Ku-bands pursuant to the ITU filings of the German Administration.<sup>2</sup> Intelsat has a pending application for

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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 *Intelsat License LLC, Request for Further Extension of Special Temporary Authority for Intelsat 10, Call Sign S2382*, File No. SAT-STA-2013-00106 (filed Aug. 13, 2013); *Policy Branch Information; Actions Taken*, Report No. SAT-00957, File No. SAT-STA-20130614-00084 (June 28, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00919, File No. SAT-STA-20121022-00186 (Dec. 14, 2012) (Public Notice). Intelsat incorporates herein by reference the description of Europe\*Star Gesellschaft Fur Satellitenkommunikation mbH (“Europe\*Star”), the entity that holds the authorization to operate at 47.5° E.L., set forth on page 2 of its STA request, File No. SAT-STA-20110715-00129. Intelsat further incorporates by reference the New Slot Usage Agreement between Europe\*Star and PanAmSat Europe, as well as Europe\*Star’s authorization from the German Administration to operate at the 47.5° E.L. orbital location, that previously were filed with the FCC. See *Policy Branch Information; Actions Taken*, Report No. SAT-00476, File No. SAT-STA-20061102-00128 (Oct. 12, 2007) (Public Notice) (granting STA request to drift Intelsat 601 from 63.65° E.L. to 47.5° E.L.).

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modification of the Intelsat 10 license to allow for its permanent operation at 47.5° E.L.<sup>3</sup>

Intelsat 10 currently is on-station at 47.5° E.L., where it will continue operating in the following TT&C frequencies:

Uplink:

14000.5 MHz (RHCP)  
14499.5 MHz (H)

Downlink:

12747.5 MHz (H and RHCP)  
12748.5 MHz (H and RHCP)

Intelsat will continue to utilize the following communications payload frequencies:

3700-4200 MHz  
5925-6425 MHz

14.0-14.5 GHz  
11.45-11.7 GHz  
12.25-12.75 GHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to meet customer demand at 47.5° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. At 47.5° E.L., Intelsat will operate the communications payload in conformance with Germany'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 10 will not be located at the same orbital location as another satellite or at an orbital location

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<sup>3</sup> See *Policy Branch Information; Satellite Space Station Applications Accepted for Filing*, Report No. SAT-00944, File No. SAT-MOD-20130322-00052 (Apr. 26, 2013) (Public Notice).

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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 10 at 47.5° E.L.

Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 10 at 47.5° 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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers