

October 23, 2013

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



Re: Request for Special Temporary Authority to Drift Intelsat 702 to, and Operate at, 32.9° E.L. (327.1° W.L.); Call Sign: S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days -- from November 1, 2013 through November 30, 2013 -- to drift Intelsat 702 (S2388) from 33.0° E.L. to 32.9° E.L. and operate the satellite at 32.9° E.L. During the short drift to 32.9° E.L. and at that location, Intelsat will continue to operate Intelsat 702 in the 5925-6425 MHz, 3700-4200 MHz, 14000-14500 MHz, 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz frequency bands and will continue to provide TT&C using the 6173.7 MHz, 6176.3 MHz (LHCP), 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (RHCP) frequencies. Intelsat seeks this STA in order to ensure safe station-keeping of Intelsat 702 with the neighboring Eutelsat 33A satellite and a satellite that Eutelsat plans shortly to bring to the nominal location. Intelsat has reached a station-keeping agreement with Eutelsat with respect to the nominal 33.0° E.L. location.

Intelsat currently operates Intelsat 702 at 33.0° E.L. pursuant to STA.² As noted above, Intelsat plans to drift Intelsat 702 to 32.9° E.L. with its

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

² See *Policy Branch Information; Actions Taken*; Report No. SAT-00972, File No. SAT-STA-20130808-00104 (Sept. 13, 2013); *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). Intelsat has a pending application to modify the license for Intelsat 702 to allow it to be redeployed permanently to 33.0° E.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00910,

communications payload operating. The drift will take approximately one week.

Intelsat will operate Intelsat 702 at 32.9° E.L. in accordance with Intelsat's coordination agreements concerning the nominal 33.0° E.L. location. With respect to the drift, there is no co-frequency satellite located in the drift path. The nearest co-frequency satellite is Intelsat 28 (f/k/a Intelsat New Dawn), which is located at 32.8° E.L. The drift will be coordinated internally with the operations of Intelsat 28. In the unlikely event that interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. 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 32.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 32.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 702 at 32.9° E.L. will help to ensure the safe station-keeping of that satellite with the two Eutelsat satellites soon to be located at the nominal 33.0° E.L. location and will not impact the Intelsat 702 customers. Accordingly, grant of this STA request is in the public interest.

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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 "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers