

S2388 SAT-STA-20131023-00124 IB2013002231
Intelsat License LLC
Intelsat 702



File # SAT- STA-20131023- 00124

Call Sign S2388 Grant Date 10/31/13
(or other identifier)

From 11/01/13 Term Dates period of 30 days
To: 30 days

Approved: Stephen J. Duall

Approved by OMB
3060-0678

Date & Time Filed: Oct 23 2013 2:52:26:273PM
File Number: SAT-STA-20131023-00124
Callsign:

*with conditions

Stephen J. Duall
Chief, Satellite Policy Branch

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority for Intelsat 702 (S2388)

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Intelsat License LLC
IBFS File No. SAT–STA–20131023–00124
Call Sign: S2388

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–20131023–00124, is GRANTED. Specifically, Intelsat is authorized, for a period of 30 days, commencing on November 1, 2013, to conduct telemetry, tracking, and command operations necessary to drift the Intelsat 702 space station (Call Sign S2388) from the 33.0° E.L. orbital location to the 32.9° E.L. orbital location and to maintain Intelsat 702 at 32.9° E.L. using the 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (space-to-Earth), and 6173.7 MHz and 6176.3 MHz (Earth-to-space) frequencies. Intelsat is also authorized, on a temporary basis, to provide Fixed-Satellite Service (FSS) via Intelsat 702 in inclined orbit mode during the drift to, and upon arrival at, the 32.9° E.L. orbital location in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands.¹ Operations under this authorization must be in accordance with the terms and conditions contained in Intelsat's application, the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

1. All operations under this grant of special temporary authority must be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating radiocommunication system. In the event of any harmful interference as a result of the operations under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference and must immediately inform the Commission, in writing, of such an event.
2. Intelsat must maintain full operational control of the Intelsat 702 space station at all times.
3. While at the 32.9° E.L. orbital location, Intelsat must maintain the Intelsat 702 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
4. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
5. Intelsat must coordinate the operations of Intelsat 702 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 32.9° E.L. orbital location.
6. Intelsat must operate Intelsat 702 at the 32.9° E.L. orbital location in accordance with any existing coordination agreements for this location.
7. Intelsat's use of the 10.95-11.2 GHz and 11.45-11.7 GHz bands is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.
8. Intelsat's operation of the Intelsat 702 space station in the 10.95-11.2 GHz and

¹ Although Intelsat 702 is also capable of operating in the 11.7-11.95 GHz band, Intelsat did not request authority to operate Intelsat 702 in this band at the 32.9° E.L. orbital location.

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11.45-11.7 GHz bands is limited to international operations in accordance with footnote NG 52 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 52.

9. Use of the 12.50-12.70 GHz frequency band is not authorized in International Telecommunication Union (ITU) Region 2.

10. Use of the 12.70-12.75 GHz frequency band is not authorized for FSS in the space-to-Earth direction in ITU Region 2.

11. Any action taken or expense incurred as a result of operations pursuant to this grant of special temporary authority is at Intelsat's own risk.

12. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application to operate Intelsat 702 at the 33.0° E.L. orbital location (IBFS File No. SAT-MOD-20121001-00163) or any future application to operate Intelsat 702 at the 32.9° E.L. orbital location.

13. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.



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Term Dates period of
From 11/01/13 To: 30 days

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact

Name:	Susan H. Crandall	Phone Number:	202-944-7848
Company:	Intelsat Corporation	Fax Number:	202-944-7870
Street:	3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall	Relationship:	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location Extend Expiration Date Other

6. Temporary Orbit Location

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests grant of Special Temporary Authority 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.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

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,

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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.

File No. SAT-MOD-20121001-00163 (Nov. 9, 2012) (Public Notice).
Intelsat plans shortly to amend that application to reflect the new location of 32.9° E.L.

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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", with a long, sweeping underline.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers