

October 23, 2013

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



Re: Request for Further Extension of Special Temporary Authority to Drift and Operate Intelsat 9 (Call Sign S2380)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60-day extension, commencing October 27, 2013, of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 9 (call sign S2380) from 58.0° W.L. to 43.10° W.L. and operate at 43.10° W.L. in inclined orbit mode.²

Intelsat 9 currently is on station at 43.10° W.L., operating co-located with Intelsat 11.³ At that location, Intelsat 9 will continue operating in the following TT&C frequencies:

Uplink:

14494.5 MHz (V)
14000.5 MHz (RHCP)

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-00909, File No. SAT-STA-20120621-00103 (Nov. 2, 2012) (Public Notice); *Intelsat License LLC, Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 9 Call Sign S2380*, File No. SAT-STA-20130424-0061 (filed Apr. 24, 2013). Intelsat began operating Intelsat 9 in inclined orbit in late 2012. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Nov. 7, 2012) (notifying the FCC of the commencement of inclined orbit operations). The satellite's expected end of life is 2016.

³ Intelsat has a pending application to modify the Intelsat 9 license to allow the satellite's permanent redeployment to 43.10° W.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00883, File No. SAT-MOD-20120703-00110 (July 20, 2012) (Public Notice).

Downlink:

11700.5 MHz (V)

11702.5 MHz (V)
11700.5 MHz (RHCP)

11702.5 MHz (RHCP)
11700.5 MHz (H)
11702.5 MHz (H)

Intelsat will continue to utilize the following communications payload frequencies:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
11450 – 11700 MHz
11700 – 12200 MHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue service at the 43.10° W.L. location.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate the TT&C and communications frequencies in accordance with its coordination agreements governing the nominal 43.0° W.L. 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. Intelsat 9 is not located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁴ Further, Intelsat is not aware of any other FCC

⁴ Intelsat 9 and Intelsat 11 are being operated in adjacent station-keeping boxes.

Ms. Marlene H. Dortch
October 23, 2013
Page 3

licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 9 at 43.10° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 9 at 43.10° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the waiver previously granted Intelsat 9 of footnote NG 104 of Section 2.106 and footnote 2 of Section 25.202(a)(1) with respect to the domestic use of the 11450-11700 MHz band continue to apply at 43.10° W.L.⁵

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

⁵ *PanAmSat Licensee Corp. Application for Authority to Use Extended Ku-Band Frequencies for Domestic Service, Order and Authorization, 20 FCC Rcd 14642 (2005).*