

November 25, 2013

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



Re: Request for Extension of 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 an additional 30-day extension -- through December 30, 2013 -- of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 702 (S2388) from 33.0° E.L. to 32.9° E.L. and to operate it in the C- and Ku-bands at 32.9° E.L.² Intelsat 702 currently is on station at 32.9° E.L.

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 extension in order to ensure continued safe station-keeping of Intelsat 702 with the neighboring Eutelsat 33A satellite and a satellite that Eutelsat recently has moved to the nominal location. Intelsat has reached a station-keeping agreement with Eutelsat with respect to the nominal 33.0° E.L. location.

Intelsat will continue to operate Intelsat 702 at 32.9° E.L. in accordance with Intelsat's coordination agreements concerning the nominal 33.0° E.L. location. 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

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-00977, File No. SAT-STA-20131023-00124 (Nov. 1, 2013) (Public Notice).

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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 located at the nominal 33.0° E.L. location. Accordingly, grant of this STA request is in the public interest.

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 large, sweeping initial 'S'.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers