November 25, 2013

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

Re: Request for Further Extension to Operate Intelsat 701
Call Sign S2400

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days, commencing November 30, 2013, of the Special Temporary Authority ("STA")[1] previously granted Intelsat to drift Intelsat 701 (call sign S2400) from 157.0° E.L. to 330.5º E.L. (29.5° W.L.) and to operate in the C- and Ku-bands at 330.5° E.L.[2] Intelsat has a pending application seeking permanent authority for this redeployment.[3]

Intelsat 701 currently is on-station at 330.5º E.L. where it has replaced Intelsat 801.[4] Intelsat currently expects to operate Intelsat 701 at 330.5° E.L. until it is de-orbited in 2018. At that location, Intelsat will continue operating in the following TT&C frequencies:

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

[1] Intelsat has filed this STA request, an FCC Form 159 and a $860.00 filing fee electronically via the International Bureau's Filing System.
[2] *See Policy Branch Information; Actions Taken*, Report No. SAT-00976, File No. SAT-STA-20130925-00116 (Oct. 25, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00941, File No. SAT-STA-20131211-00216 (Apr. 5, 2013) (Public Notice).
[3] *See Intelsat License LLC Application to Modify Authorization for Intelsat 701*, File No. SAT- SAT-MOD-20130513-00068 (filed May 13, 2013).
[4] *See Policy Branch Information; Actions Taken*, Report No. SAT-00723, File No. SAT-MOD-20100208-00024 (Sept. 24, 2010) (Public Notice).

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Downlink:

3947.5 MHz (RHCP)
3948.0 MHz (RHCP)

3952.5 MHz (RHCP)
3952.0 MHz (RHCP)

Intelsat will continue to utilize the following communications payload frequencies:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
10950 – 11200 MHz
11450 – 11700 MHz
11700 – 11950 MHz
12500 – 12750 GHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue service to customers at 330.5° E.L. that were formerly being served by Intelsat 801 (call sign S2391). Intelsat 801 is currently being de-orbited.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 701 at 330.5° E.L. in accordance with Intelsat's coordination agreements related to the 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. Except briefly for Intelsat 801, Intelsat 701 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 701 at 330.5º E.L. Finally, Intelsat is not aware of any

system with an overlapping station-keeping volume with Intelsat 701 at 330.5° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 701 spacecraft continue to apply at the 330.5° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules.[5]

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this extension request.

Sincerely,

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

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[5] *See Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit,* Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000), *recon. denied*, 15 FCC Rcd 25234 (2000).