

February 26, 2014

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



Re: Request for Extension of Special Temporary Authority to Operate  
Intelsat 5  
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 120 days – commencing March 4, 2014 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to operate Intelsat 5 (call sign S2704) temporarily at 50.15° E.L. in inclined orbit in the C- and Ku-bands in accordance with the ITU filings of Turkey.<sup>2</sup> Intelsat has a pending application to modify the Intelsat 5 license to extend the satellite's license term and understands that grant of this STA extension request would be without prejudice to any action on that application.<sup>3</sup>

Intelsat expects Intelsat 5 to operate at 50.15° E.L. through the first or second quarter of 2014, when Turksat-4B is expected to be launched to the nominal location.

At the 50.15° E.L. location, Intelsat will continue operating in the following TT&C frequencies:

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

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00973, File No. SAT-STA-20130808-00105, (Sept. 20, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00972, File No. SAT-STA-20130717-00095 (Sept. 6, 2013) (Public Notice).

<sup>3</sup> Intelsat is seeking permanently to extend the Intelsat 5 license through December 31, 2020. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00937, File No. SAT-MOD-20121002-00176 (Mar. 15, 2013) (Public Notice).

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Uplink:

14498 MHz (H)  
13999 MHz (RHCP)

Downlink:

11451 MHz (H, V and RHCP)  
11452 MHz (H, V and RHCP)  
11454 MHz (RHCP and LHCP)

Intelsat will continue to utilize the following communications payload frequencies:

Uplink:

5925-6425 MHz  
12750-13250 MHz  
14000-14250 MHz

Downlink:

3700-4200 MHz  
10700-10950 MHz  
11200-11450 MHz  
11450-11700 MHz

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue meeting customer demand for temporary service at 50.15° E.L.

Grant of this STA extension request will not result in increased risk of harmful interference. At 50.15° E.L., Intelsat will continue to operate the above listed frequencies in accordance with Turkey's coordination agreements related to that location or on a non-interference, non-protected basis.

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 5 is not located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume

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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 5 at 50.15° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 50.15° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Susan H. Crandall", with a large, sweeping initial "C" on the left.

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers