

S2400 SAT-STA-20140326-00035 IB2014000557
Intelsat License LLC
Intelsat 701



File # SAT-STA-20140326-00035

Call Sign S2400 Grant Date 04/01/14
(or other identifier)

Term Dates period of
From 03/30/14 To: 60 days

Approved: Steph J. Duall

Approved by OMB
3060-0678

Date & Time Filed: Mar 26 2014 3:06:19:363PM
File Number: SAT-STA-20140326-00035
Callsign:

*with conditions

Steph J. Duall
Steph 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 Further Extension of Special Temporary Authority to Operate Intelsat 701, Call Sign S2400

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-20140326-00035
Call Sign: S2400

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT-STA-20140326-00035, is GRANTED. Specifically, Intelsat is authorized for a period of 60 days, commencing on March 30, 2014, to continue to perform Telemetry, Tracking, and Command (TT&C) operations necessary to maintain the Intelsat 701 space station (Call Sign S2400) at the 29.5° W.L. orbital location using the following center frequencies: 6173.7 MHz and 6176.3 MHz (Earth-to-space); 3947.5 MHz, 3948.0 MHz, 3952.5 MHz, and 3952.0 MHz (space-to-Earth). Intelsat is also authorized, on a temporary basis, to provide Fixed-Satellite Service (FSS) via Intelsat 701 in inclined orbit mode at the 29.5° W.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), 11.7-11.95 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. 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. While at the 29.5° W.L. orbital location, Intelsat must maintain the Intelsat 701 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
3. 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.
4. Intelsat's request that the Part 25 waivers originally granted to the Intelsat 701 spacecraft, Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules, 47 C.F.R §§ 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a), continue to apply at the 29.5° W.L. orbital location, is granted.
5. Intelsat's operation of the Intelsat 701 space station in the 10.95-11.2 GHz and 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.
6. Intelsat's use of the 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.
7. Use of the 12.5-12.70 GHz frequency band is not authorized in International Telecommunication Union (ITU) Region 2.
8. 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.

Intelsat License LLC
IBFS File No. SAT–STA–20140326–00035
Call Sign: S2400

9. Intelsat’s operation of Intelsat 701 at the 29.5° W.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), 11.7-11.95 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz frequency bands is subject to the following conditions:

- (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
- (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.

10. This grant of special temporary authority is without prejudice to any decision with respect to any replacement expectancy at the 157.0° E.L. orbital location in the 3625-3700 MHz, 5850-5925 MHz, and 11.7-11.95 GHz frequency bands.¹

11. This grant of special temporary authority is without prejudice to any decision with respect to any replacement expectancy at the 29.5° W.L. orbital location in the 5850-5925 and 3625-3700 MHz bands.²

12. Grant of this authorization does not constitute “specific authority” pursuant to 25.161(c) of the Commission's rules.

13. Grant of this authorization is without prejudice to any action on IBFS File No. SAT-MOD-20130513-00068.


14. 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.

¹ Intelsat notified the Commission that Intelsat 701 left the 157.0° E.L. station-keeping box on February 20, 2013. *See* Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, dated Feb. 21, 2013, available in IBFS File No. SAT–STA–20130204–00015. As a result of this departure, Intelsat is not operating, nor has Intelsat indicated any intent to operate, another space station at 157.0° E.L. using the 3625-3700 MHz, 5850-5925 MHz, and 11.7-11.95 GHz frequency bands that were previously authorized for use by Intelsat at that location. *See, e.g.* IBFS File Nos. SAT-MOD-20070511-00071 (granted July 20, 2007) and SAT-STA-20130204-00014 (granted February 14, 2013).

² Intelsat 701 will provide service at 29.5° W.L. in all of the same frequency bands as Intelsat 801 (call sign S2391), which currently operates at that location, except for the 5850-5925 and 3625-3700 MHz bands. Intelsat 801 is expected to be de-orbited in late 2013.

Intelsat License LLC
IBFS File No. SAT-STA-20140326-00035
Call Sign: S2400

15. 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.

 GRANTED* International Bureau *with conditions	File # <u>SAT-STA-20140326-0035</u>
	Call Sign <u>S2400</u> Grant Date <u>04/01/14</u> (or other identifier)
	Term Dates period of From <u>03/30/14</u> To: <u>60 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
Name:	Susan H. Crandall
Company:	Intelsat Corporation
Street:	3400 International Drive, N.W.
City:	Washington
Country:	USA
Attention:	Susan H. Crandall
Phone Number:	202-944-7848
Fax Number:	202-944-7870
E-Mail:	susan.crandall@intelsat.com
State:	DC
Zipcode:	20008 -3006
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 SATMOD2013051300068 or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CRY – Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input checked="" type="radio"/> Extend Expiration Date <input type="radio"/> Other	
6. Temporary Orbit Location	7. Requested Extended Expiration Date 2014-05-28 00:00:00.0

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 an additional 60 days, commencing March 30, 2014, of the Special Temporary Authority previously granted Intelsat to drift Intelsat 701 (call sign S2400) from 157.0 E.L. to 330.5 E.L. (29.5 W.L.) and to operate in the C- and Ku-bands at 330.5 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
Assoc. 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

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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.

March 26, 2014

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 March 30, 2014, of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 701 (call sign S2400) from 157.0° E.L. to 330.5° 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 330.5° E.L. where it replaced the recently de-orbited 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:

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-00993, File No. SAT-STA-20140123-00008 (Jan. 31, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00984, File No. SAT-STA-20131125-00140 (Dec. 6, 2013) (Public Notice); *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 *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00983, File No. SAT- SAT-MOD-20130513-00068 (Nov. 29, 2013) (Public Notice).

⁴ See Letter from Susan H. Crandall, Intelsat, to Ms. Marlene H. Dortch, Federal Communications Commission, Call Sign S2391 (Dec. 18, 2013).

Ms. Marlene H. Dortch
March 26, 2014
Page 2

Uplink:

6173.7 MHz (LHCP)
6176.3 MHz (LHCP)

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 further 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).

Grant of this STA further 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

Ms. Marlene H. Dortch
March 26, 2014
Page 3

other operational space stations. 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 330.5° 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 further extension request.

Sincerely,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

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).