

April 21, 2014

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



Re: Request for Special Temporary Authority to Drift and Operate
Intelsat 7
Call Sign S2229

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days, commencing July 1, 2014 through December 28, 2014, to drift Intelsat 7 (call sign S2229) from 68.65° E.L. to 18.2° W.L. Intelsat 7 temporarily will be collocated with the Intelsat 901 satellite, which currently operates at the 18.0° W.L. orbital location.² Intelsat 7 currently is authorized to operate at 68.65° E.L.³

During the drift of Intelsat 7 from 68.65° E.L. to 18.2° W.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

13998 MHz (RHCP)

Downlink:

11451 MHz (H and LHCP)

11453 MHz (V and LHCP)

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 *The 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*, 15 FCC Rcd 15460, File Nos: SAT-A/O-20000119-00002 to SAT-A/O-20000119-00018; SAT-AMD-20000119-00029 to SAT-AMD-20000119-00041; and SAT-LOA-20000119-00019 to SAT-LOA-20000119-00028 (2000).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00222, File No. SAT-MOD-20040405-00078 (June 18, 2004) (Public Notice).

Intelsat anticipates that the drift of Intelsat 7 from 68.65° E.L. to 18.2° W.L. will take approximately 9 months. As such, Intelsat anticipates filing a request for extension of drift authority that will include a request to operate Intelsat 7 when it arrives at 18.2° W.L. in approximately April 2015. Once on-station at 18.2° W.L., Intelsat 7 is expected to operate in the following communications frequencies for 180 days:

3400-3700 MHz
6425-6725 MHz

10.95-11.2 GHz
11.45-11.7 GHz
13.75-14.25 GHz

Grant of this STA request is in the public interest because it will allow Intelsat to meet additional temporary customer demand at 18.2° W.L. The Intelsat 7 satellite will operate in several frequencies not utilized by the Intelsat 901 satellite (6425-6725 MHz, 3400-3625 MHz, and 13.75-14.25 GHz). Use of these additional frequencies at the 18.2° W.L. location will enhance services provided to Intelsat customers. In addition, the FCC recently extended the license term for Intelsat 7, finding continued operation of the Intelsat 7 satellite to be in the public interest.⁴ This request for STA to relocate Intelsat 7 will serve the public interest by placing the satellite temporarily in a location that will best serve customer needs.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once Intelsat 7 is on-station at 18.2° W.L., Intelsat will operate the communications payload in conformance with its coordination agreements related to that location or on a non-interference, non-protected basis. Additionally, Intelsat agrees to operate Intelsat 7 at 18.2° W.L. in accordance with the frequency-related conditions in the

⁴ Policy Branch Information; Actions Taken, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (March 21, 2014) (Public Notice).


Ms. Marlene H. Dortch
April 21, 2014
Page 3

Commission's 2004 order granting authority for the Intelsat 7 satellite to operate at 68.5° E.L.⁵

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 7 will not be located an orbital location that has an overlapping station-keeping volume with another satellite.⁶ 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 7 at 18.2° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 7 at 18.2° W.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,


Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁵ See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Hybrid Communications Satellite Known at 68.5° E.L.*, Order and Authorization, 19 FCC Rcd 6137, File Nos. SAT-LOA-19960202-00017, SAT-AMD-19960411-0055, SAT-AMD-19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162 (2004). Intelsat 7's location subsequently was changed to 68.65° E.L. See *supra* n.3.

⁶ At the nominal 18.0° W.L. orbital location, Intelsat 7 will be collocated with the Intelsat 901 satellite. Intelsat 7 and Intelsat 901 will operate in separate station keeping boxes, and Intelsat will coordinate their operations internally.