

May 2, 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 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 180 days, commencing upon grant, to drift Intelsat 5 (call sign S2704) from 50.15° E.L. to 157.0° E.L., and to operate the satellite at 157.0° E.L. in the C- and Ku-bands, where it will replace the Intelsat 706 satellite that currently is scheduled to be de-orbited in November 2014. Intelsat also seeks to extend the Intelsat 5 license term for the duration of this STA request.² Intelsat expects shortly to file an application for modification of the Intelsat 5 license to allow for its permanent operation at 157.0° E.L.

Intelsat 5 currently is operating at 50.15° E.L. pursuant to Special Temporary Authority.³ Subject to receipt of FCC approval, Intelsat 5 will be relocated to 157.0° E.L.—with the drift starting June 1, 2014 and the satellite on-station in early October 2014.⁴

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 Intelsat has a pending application to modify the Intelsat 5 license to extend the license term 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).

³ *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). *Policy Branch Information; Actions Taken*, Report No. Intelsat has a pending request to extend the STA for 120 more days. *See Intelsat License LLC Request for Extension of STA*, File No. SAT-STA-20140226-00028 (filed Feb. 26, 2014).

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During the drift of Intelsat 5 from 50.15° E.L. to 157.0° E.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:

14498 MHz (H)
13999 MHz (RHCP)

Downlink:

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

Once located at 157.0° E.L., Intelsat also will operate the satellite's communications frequencies as set forth below:

Uplink:

5925-6425 MHz
12750-13250 MHz⁵
14000-14250 MHz

Downlink:

3700-4200 MHz
10700-10950 MHz⁵
11200-11450 MHz⁵
11450-11700 MHz

⁴ Intelsat has filed a 30-day STA request to begin drifting Intelsat 5 on June 1, 2014. See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20140501-00044 (filed May 1, 2014).

⁵ The bands 12750-13250 MHz, 10700-10950 MHz, and 11200-11450 MHz will be used on a non-protected, non-interference basis at 157.0° E.L., as there is no U.S. ITU filing for these Appendix 30B frequencies at this location.

Grant of this STA request is in the public interest because it will allow Intelsat to offer continuity of service to customers at 157.0° E.L. that are currently on Intelsat 706. As noted above, Intelsat 706 is expected to be de-orbited in November of this year.

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 5 is on-station at 157.0° E.L., Intelsat will operate the communications payload in conformance with its coordination agreements related to that 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. Intelsat 5 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.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 5 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 5 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁶ Intelsat expects to move Intelsat 706 slightly outside of the nominal 157.0° E.L. location prior to the arrival of Intelsat 5. Intelsat expects shortly to file for FCC approval of this temporary redeployment.

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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 "S. Crandall", written in a cursive style.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spears