

S2388 SAT-STA-20140620-00073 IB2014001245  
Intelsat License LLC  
Intelsat 702



File # SAT-STA-20140620-00073

Call Sign S2388 Grant Date 06/25/14  
(or other identifier)

Term Dates period of  
From 06/29/14 To: 60 days

Approved by OMB  
3060-0678

Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Satellite Policy Branch

\*with conditions

Date & Time Filed: Jun 20 2014 4:39:25:363PM  
File Number: SAT-STA-20140620-00073  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY  
  
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Request for Further Extension of Special Temporary Authority for Intelsat 702 (S2388)

1. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	202-944-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	c/o Intelsat Corporation 3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall		

**Intelsat License LLC**  
**IBFS File No. SAT-STA-20140620-00073**  
**Call Sign: S2388**

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT-STA-20140620-00073, is GRANTED. Specifically, Intelsat is authorized, for a period of 60 days, commencing on June 29, 2014, to continue to conduct telemetry, tracking, and command operations necessary to maintain the Intelsat 702 space station (Call Sign S2388) at the 32.9° E.L. orbital location using the 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (space-to-Earth), and 6173.7 MHz and 6176.3 MHz (Earth-to-space) frequencies. Intelsat is also authorized, on a temporary basis, to continue to provide Fixed-Satellite Service (FSS) via Intelsat 702 in inclined orbit mode at the 32.9° E.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), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands.<sup>1</sup> 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. Intelsat must maintain full operational control of the Intelsat 702 space station at all times.
3. While at the 32.9° E.L. orbital location, Intelsat must maintain the Intelsat 702 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
4. 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.
5. Intelsat must coordinate the operations of Intelsat 702 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 32.9° E.L. orbital location.
6. Intelsat must operate Intelsat 702 at the 32.9° E.L. orbital location in accordance with any existing coordination agreements for this location.
7. Intelsat's use of the 10.95-11.2 GHz and 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.
8. Intelsat's operation of the Intelsat 702 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

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<sup>1</sup> Although Intelsat 702 is also capable of operating in the 11.7-11.95 GHz band, Intelsat did not request authority to operate Intelsat 702 in this band at the 32.9° E.L. orbital location.

**Intelsat License LLC**  
**IBFS File No. SAT-STA-20140620-00073**  
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to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 52.


9. Use of the 12.50-12.70 GHz frequency band is not authorized in International Telecommunication Union (ITU) Region 2.

10. 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.

11. 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.

12. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application to operate Intelsat 702 at the 33.0° E.L. orbital location (IBFS File No. SAT-MOD-20121001-00163) or any future application to operate Intelsat 702 at the 32.9° E.L. orbital location.

13. 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.

 <b>GRANTED*</b> International Bureau *with conditions	<b>File #</b> <u>SAT-STA-20140620-00073</u>
	<b>Call Sign</b> <u>S2388</u> <b>Grant Date</b> <u>06/25/14</u> (or other identifier)
	<b>Term Dates</b> period of <b>From</b> <u>06/29/14</u> <b>To:</b> <u>60 days</u>
	<b>Approved:</b> <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact

<b>Name:</b>	Susan H. Crandall	<b>Phone Number:</b>	202-944-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H. Crandall	<b>Relationship:</b>	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 SATAMD2014020400019 or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification    CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location                       Extend Expiration Date                       Other

6. Temporary Orbit Location

7. Requested Extended Expiration Date  
2014-08-27 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-day extension, through August 27, 2014, of the Special Temporary Authority previously granted Intelsat to drift Intelsat 702 (S2388) from 33.0 E.L. to 32.9 E.L. and to operate it in the C- and Ku-bands at 32.9 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**

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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.**

June 20, 2014

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



Re: Request for Further Extension of Special Temporary Authority to  
Drift Intelsat 702 to, and Operate at, 32.9° E.L. (327.1° W.L.);  
Call Sign: S2388

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60-day extension – through August 27, 2014 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted Intelsat to drift Intelsat 702 (S2388) from 33.0° E.L. to 32.9° E.L. and to operate it in the C- and Ku-bands at 32.9° E.L.<sup>2</sup> Intelsat 702 currently is on station at 32.9° E.L.

Intelsat will continue to operate Intelsat 702 in the 5925-6425 MHz, 3700-4200 MHz, 14000-14500 MHz, 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz frequency bands and will continue to provide TT&C using the 6173.7 MHz, 6176.3 MHz (LHCP), 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (RHCP) frequencies. Intelsat seeks this STA

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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-01013, File No. SAT-STA-20140424-00041 (May 1, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01002, File No. SAT-STA-20140225-00027 (Mar. 14, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00993, File No. SAT-STA-20140123-0007 (Jan. 31, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00991, File No. SAT-STA-20131219-00147 (Jan. 10, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00977, File No. SAT-STA-20131125-00139 (Dec. 6, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00977, File No. SAT-STA-20131023-00124 (Nov. 1, 2013) (Public Notice). Intelsat has a pending application to modify the license for Intelsat 702 to allow for its permanent operation at 32.9° E.L. See *Intelsat License LLC Amendment to Pending Application for Modification of Authority for Intelsat 702*, File No. SAT-AMD-20140204-00019 (filed Feb. 4, 2014); *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00910, File No. SAT-MOD-20121001-00163 (Nov. 9, 2012) (Public Notice).

Ms. Marlene H. Dortch  
June 20, 2014  
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further extension in order to ensure continued safe station-keeping of Intelsat 702 with the neighboring Eutelsat 33A satellite and a satellite that Eutelsat recently has moved to the nominal location. Intelsat has reached a station-keeping agreement with Eutelsat with respect to the nominal 33.0° E.L. location.

Intelsat will continue to operate Intelsat 702 at 32.9° E.L. in accordance with Intelsat's coordination agreements concerning the nominal 33.0° E.L. location. In the unlikely event that interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 702 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 702 at 32.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 32.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 702 at 32.9° E.L. will help to ensure the safe station-keeping of that satellite with the two Eutelsat satellites located at the nominal 33.0° E.L. location. Accordingly, grant of this STA further extension request is in the public interest.

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