

June 26, 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 706
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing August 22, 2014, to drift Intelsat 706 (call sign S2401) from 157.0° E.L. to 156.9° E.L., where it will operate in the C- and Ku-bands in inclined orbit² until traffic is transferred to Intelsat 5 and the satellite is de-orbited.³ Intelsat seeks authority to operate both the TT&C and communications frequencies on the satellite during the drift.

Intelsat 706 is currently operating at 157.0° E.L.⁴ Following receipt of FCC approval, Intelsat 706 will begin drifting naturally to 156.9° E.L. on August 22,

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 706 began operating in inclined orbit mode in 2011. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Call Sign S2401 (filed July 20, 2011).

³ Intelsat 5 currently is drifting to 157.0° E.L. pursuant to STA. *See Policy Branch Information; Actions Taken*, Report No. SAT-01019, File No. SAT-STA-20140501-00044 (May 30, 2014) (Public Notice). Intelsat also has a pending 180-day STA request to drift and operate the satellite at 157.0° E.L. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01018, File No. SAT-STA-20140502-00047 (May 30, 2014) (Public Notice). Intelsat 706 is expected to be de-orbited in November 2014.

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-01009, File No. SAT-STA-20140403-00037 (Apr. 11, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00995, File No. SAT-STA-20140203-00012 (Feb. 7, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00985, File No. SAT-STA-20131204-00144 (Dec. 13, 2013) (Public Notice); *Policy Branch Information; Actions Taken*,

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2014. It is expected to be on-station at that location in 30 days. As noted above, during the drift of Intelsat 706 from 157.0° E.L. to 156.9° E.L., Intelsat will operate both the satellite's TT&C frequencies and its communications frequencies.

The specific TT&C frequencies are as follows:

Uplink:

6173.7 (LHCP)
6176.3 (LHCP)

Downlink:

3947.5 (RHCP)
3948.0 (RHCP)
3952.5 (RHCP)
3952.0 (RHCP)

The specific communications frequencies are as follows:

3700 – 4200 MHz (space-to-Earth)
5925 – 6425 MHz (Earth-to-space)
10950 – 11200 MHz (space-to-Earth)
11450 – 11700 MHz (space-to-Earth)

Report No. SAT-00977, File No. SAT-STA-2013101700120 (Nov. 1, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00972, File Nos. SAT-STA-20130807-00103 and SAT-STA-20130607-00081 (Sept. 13, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00947, File No. SAT-STA-20130408-00057 (May 3, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00931, File No. SAT-STA-20130206-00017 (Feb. 15, 2013) (Public Notice). Intelsat has a pending application for modification of the Intelsat 706 license to allow the satellite to operate at 157.0° E.L. on a permanent basis. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. 00915, File No. SAT-MOD-20121026-00188 (Nov. 30, 2012) (Public Notice).

12500 – 12750 MHz (space-to-Earth)
14000 – 14500 MHz (Earth-to-space)⁵

Grant of this STA request is in the public interest because it will allow Intelsat to move the inclined Intelsat 706 satellite out of the 157.0° E.L. box prior to the arrival of Intelsat 5, which will help ensure safe station-keeping of both satellites during traffic transfer. Customers on Intelsat 706 will not be adversely affected by the redeployment contemplated herein.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will coordinate the drift and continued operations with all potentially affected operators and all operations will conform to Intelsat's coordination agreements for the nominal 157.0° E.L. orbital location. Intelsat confirms that there are no co-frequency satellites between 157.0° E.L. and 156.9° E.L.

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 706 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 706 at 156.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 156.9° 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 706 spacecraft continue to apply at the 156.9° 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.⁶

⁵ Although Intelsat 706 has the capability to transmit in the 11700 – 11950 MHz band, Intelsat does not seek authority to use these frequencies on Intelsat 706 either during the drift to or at the 156.9° E.L. orbital location.

⁶ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Crandall". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers