

July 22, 2014

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

Re: Request for Further Extension of Special Temporary to Drift Intelsat 5
Call Sign S2704

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from July 31, 2014 through August 29, 2014— of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to drift Intelsat 5 (call sign S2704) from 50.15° E.L. to 157.0° E.L.² Intelsat is not herein seeking authority to operate at 157.0° E.L.³ Intelsat also seeks to extend the Intelsat 5 license term for the duration of this STA request.⁴ 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 drifting to 157.0° E.L. and the satellite is expected to be on-station in early October 2014.

¹ Intelsat has filed this STA request, an FCC Form 159 and a \$930.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01025, File No. SAT-STA-20140620-00072 (June 27, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01019, File No. SAT-STA-20140501-00044 (May 30, 2014) (Public Notice).

³ Intelsat has a pending 180-day STA request to drift and 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. 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).

⁴ 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).

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During the drift of Intelsat 5 from 50.15° E.L. to 157.0° E.L., Intelsat will continue to 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)

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue drifting Intelsat 5 in order to provide continuity of service to customers at 157.0° E.L. that are currently on Intelsat 706, following the de-orbit of Intelsat 706.

Grant of this STA further extension 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.

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. Except briefly for Intelsat 706, 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.⁵ 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.

⁵ Intelsat expects to move Intelsat 706 slightly outside of the nominal 157.0° E.L. location prior to the arrival of Intelsat 5, after which traffic will be transferred to Intelsat 5. *See Policy Branch Information; Actions Taken*, Report No. SAT-01029, File No. SAT-STA-20140627-00081 (July 18, 2014) (Public Notice). Intelsat 706 is expected to remain at that slightly offset location until it is de-orbited.

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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