

August 1, 2014

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

Re: Request for Further Extension of Special Temporary Authority to Operate Intelsat 706  
Call Sign S2401

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—through September 5, 2014—of the Special Temporary Authority (“STA”)<sup>1</sup> originally granted Intelsat to operate Intelsat 706 (call sign S2401) at 157.0° E.L. in the C- and Ku-bands in inclined orbit.<sup>2</sup> As the Commission is aware, on August 22, 2014, pursuant to STA, Intelsat plans to commence drifting Intelsat 706 from 157.0° E.L. to 156.9° E.L., where it will operate in the C- and Ku-bands in inclined orbit until traffic is transferred to Intelsat 5 and the satellite is de-orbited.<sup>3</sup>

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and a filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01025, File No. SAT-STA-20140604-00056 (June 27, 2014) (Public Notice); *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*, 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 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). Intelsat’s long-pending application for permanent authority to operate Intelsat 706 at 157.0° E.L. will be moot after the August move to 156.9° E.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00915, File No. SAT-MOD-20121026-00188 (Nov. 30, 2012) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01029, File No. SAT-STA-20140627-00081 (July 18, 2014) (Public Notice). Intelsat herein requests a 30-day extension in order to accommodate any delay in the start of Intelsat 706’s drift to 156.9° E.L.

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At 157.0° E.L., Intelsat 706 will continue to operate in the following frequencies:

TT&C frequencies:

Uplink:

6173.7 (LHCP)  
6176.3 (LHCP)

Downlink:

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

Communications frequencies:

3700 – 4200 MHz (space-to-Earth)  
5925 – 6425 MHz (Earth-to-space)  
10950 – 11200 MHz (space-to-Earth)  
11450 – 11700 MHz (space-to-Earth)  
12500 – 12750 MHz (space-to-Earth)  
14000 – 14500 MHz (Earth-to-space)

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue providing service at 157.0° E.L. until the satellite is redeployed to 156.9° E.L. in late August.

Grant of this STA further extension request will not result in increased risk of harmful interference. Intelsat will continue to operate at 157.0° E.L. in conformance with its coordination agreements for the 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 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 157.0° E.L.

Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 706 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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Intelsat requests that the Part 25 waivers originally granted to the Intelsat 706 spacecraft continue to apply at the 157.0° 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.<sup>4</sup>

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

Sincerely,



Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

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<sup>4</sup> 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).