

August 22, 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 October 26, 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 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.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$930.00 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-20140620-00073 (June 17, 2014) (Public Notice); *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).

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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