August 25, 2014

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

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of the Intelsat 30 Satellite (File Nos. SAT-LOA-20121025-00187; SAT-MOD-20121221-00220) Call Sign S2887

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 30 days, from October 26, 2014 through November 24, 2014, to conduct in-orbit testing ("IOT") of the Intelsat 30 satellite (Call Sign S2887) at 98.1º W.L. in the bands 10950-11200 MHz, 11450-11700 MHz, and 11700-12200 MHz (downlink), 13750-14000 MHz and 14000-14500 MHz (uplink), as well as run antenna cuts at 3511 MHz (downlink) and 6536 MHz (uplink),[2] and to drift the satellite to its permanent location of 95.05° W.L.[3] Intelsat 30 currently is scheduled to be launched on October 16, 2014. In support of its request, Intelsat submits the following information.

During in-orbit testing of Intelsat 30 at 98.1° W.L., Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat's knowledge, the only co-frequency satellites within plus/minus six degrees of 98.1º W.L. are Brazilsat B3 at 92.0° W.L., Galaxy 25 at 93.1° W.L., Galaxy 3C at 95.0° W.L., Galaxy 19 at 97.0° W.L., Inmarsat 4-F3 at 97.7° W.L., Galaxy 16 at 99.0° W.L., SES-1 at 101.0° W.L., and AMC-1 and SES-3 at 103.0° W.L. Intelsat currently is in coordination discussions with StarOne, the operator Brazilsat B3; Inmarsat, the operator of Inmarsat 4-F3; and SES World Skies, the operator of AMC-1, SES-1, and SES-3, regarding the Intelsat 30 C/Ku-band IOT. With regard to the remaining spacecraft, Intelsat will internally coordinate the proposed testing with the operations of these satellites. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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[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] The remainder of the satellite's C-band frequencies – 3400-3700 MHz (downlink) and 6425-6725 MHz (uplink) – will be tested at the satellite's permanent licensed location of 95.05° W.L.

[3] *See Policy Branch Information; Actions Taken*, Report No. SAT-01036, File Nos. SAT-LOA-20121025-00187, and SAT-AMD-20121221-00220 (Aug. 15, 2014) (Public Notice). During the drift from 98.1° W.L. to 95.05º W.L., only the satellite's TT&C frequencies will be utilized. The TT&C frequencies are: 11198.0 MHz, 11198.5 MHz, 11199.25 MHz, and 11199.75 MHz (space-to-Earth), and 13750.5 MHz and 14003.5 MHz (Earth-to-space).

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 during in-orbit testing at 98.1° W.L. Intelsat 30 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 30 at 98.1° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 30 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The in-orbit testing of Intelsat 30's Ku-band payload and the running of antenna cuts in certain C-band frequencies at 98.1° W.L. is a critical step in ensuring that the satellite will be fully operational at 95.05° W.L. This, in turn, will ensure continuity of service to customers at the 95.05° W.L. location, and thereby promotes the public interest.

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

Sincerely,

Susan H. Crandall /cg

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers