

September 17, 2014

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—through October 19, 2014—of the Special Temporary Authority (“STA”)<sup>1</sup> originally granted Intelsat to drift Intelsat 706 (call sign S2401) from 157.0° E.L. to 156.9° E.L.,<sup>2</sup> and to operate it in the C- and Ku-bands in inclined orbit<sup>3</sup> until traffic is transferred to Intelsat 5 and Intelsat 706 is de-orbited.<sup>4</sup> Intelsat seeks authority to continue operating 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)

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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-01029, File No. SAT-STA-20140627-00081 (July 18, 2014) (Public Notice). Intelsat’s STA includes authority to operate both TT&C and communications frequencies. Intelsat 706 has completed its drift and is on-station at 156.9° E.L.

<sup>3</sup> 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).

<sup>4</sup> Intelsat 706 is expected to be de-orbited in November 2014.

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)  
12500 – 12750 MHz (space-to-Earth)  
14000 – 14500 MHz (Earth-to-space)<sup>5</sup>

Grant of this STA extension request is in the public interest because it will allow Intelsat to provide continuity of service at 157.0° E.L. and help ensure safe station-keeping of both Intelsat 706 and Intelsat 5 during traffic transfer. Customers on Intelsat 706 will not be adversely affected by the redeployment contemplated herein.

Grant of this STA extension request will not result in increased risk of harmful interference. All operations will conform to Intelsat's coordination agreements for the nominal 157.0° E.L. orbital 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 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.<sup>6</sup>

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<sup>5</sup> 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 at the 156.9° E.L. orbital location.

<sup>6</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).

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers