

September 25, 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 September 29, 2014 through October 28, 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 additionally has a pending application for modification of the Intelsat 5 license to allow for its permanent operation at 157.0° E.L.⁵

Intelsat currently is completing the drift of Intelsat 5 to 157.0° E.L. The satellite is expected to be on-station by the end of today.

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 *Intelsat License LLC*, Request for Further Extension of Special Temporary Authority to Drift Intelsat 5, Call Sign S2704, File No. SAT-STA-20140822-00091 (filed Aug. 22, 2014); *Policy Branch Information; Actions Taken*, Report No. SAT-01031, File No. SAT-STA-20140722-00088 (July 25, 2014) (Public Notice); *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).

⁵ See *Application of Intelsat License LLC To Modify Authorization of Intelsat 5(S2704)*, File No. SAT-MOD-20140829-00097 (filed Aug. 22, 2014).

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Until it has received authority to operate the communications payload, Intelsat will continue to utilize only the satellite's TT&C frequencies at 157.0° E.L. The specific TT&C frequencies are as follows:

Uplink:	Downlink:
14498 MHz (H)	11451 MHz (H, V, and RHCP)
13999 MHz (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 safe station-keeping of Intelsat 5, which was moved to 157.0° E.L. in order to provide continuity of service to customers 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 remainder of the drift and while the satellite is on-station at 157.0° E.L. Intelsat will coordinate its TT&C transmissions with operators of satellites in the remaining drift path. On-station at 157.0° E.L., Intelsat will operate the satellite's TT&C transmissions consistent 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 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.⁶ 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.

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

Sincerely,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spears

⁶ Intelsat 706 was moved to 156.9° E.L. prior to the arrival of Intelsat 5. *See Policy Branch Information; Actions Taken*, Report No. SAT-00402, File No. SAT-STA-20140917-00101 (Sept. 19, 2014) (Public Notice); *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.