

October 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 Special Temporary Authority to Operate Intelsat 7 at 18.2° W.L.; Call Sign: S2229

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)<sup>1</sup> for 180 days, commencing December 29, 2014, to operate Intelsat 7 (S2229) at 18.2° W.L. in the TT&C frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 6425 – 6650 MHz, 3400 – 3625 MHz, and 13750 – 14000 MHz.<sup>2</sup> Intelsat 7 will temporarily be collocated with the Intelsat 901 satellite, which currently operates at the 18.0° W.L. orbital location.<sup>3</sup> Intelsat seeks this STA in order to provide additional capacity at 18.2° W.L.

Intelsat 7 is permanently licensed at 68.65° E.L.<sup>4</sup> Pursuant to an existing STA, the satellite is currently drifting to 18.2° W.L. from 68.65° E.L.<sup>5</sup> Intelsat expects the satellite will be on-station at 18.2° W.L. by the end of December 2014. Intelsat will operate Intelsat 7 at 18.2° W.L. in conformance with its coordination agreements related to the nominal 18.0° W.L. location or on a non-interference, non-protected basis. Additionally, Intelsat agrees to operate Intelsat 7 at 18.2° W.L. in accordance with the relevant frequency-related conditions in the Commission’s 2004 order granting authority for the Intelsat 7 satellite to operate at 68.5° E.L.<sup>6</sup>

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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> Although Intelsat 7 also includes the bands 3625 – 3700 MHz, 10950 – 11200 MHz, 11450 – 11700 MHz, and 1400 – 14250 MHz, Intelsat is not seeking authority to operate in these bands in this request.

<sup>3</sup> See *The Applications of Intelsat LLC For Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, File Nos: SAT-A/O-20000119-00002 to SAT-A/O-20000119-00018; SAT-AMD-20000119-00029 to SAT-AMD-20000119-00041; and SAT-LOA-20000119-00019 to SAT-LOA-20000119-00028 (2000).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Mar. 21, 2014) (Public Notice).

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01025, File No. SAT-STA-20140421-00039 (June 27, 2014) (Public Notice).

<sup>6</sup> See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Hybrid Communications Satellite Known at 68.5° E.L.*, Order and Authorization, 19 FCC Rcd 6137, File Nos. SAT-LOA-19960202-00017,

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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 7 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.<sup>7</sup>

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 7 at 18.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 7 at 18.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 7 at 18.2° W.L. will provide additional capacity at that location. Accordingly, grant of this STA request is in the public interest.

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

Sincerely,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

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SAT-AMD-19960411-0055, SAT-AMD-19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162 (2004). Intelsat 7's location subsequently was changed to 68.65° E.L. *See supra* n.3.

<sup>7</sup> At the nominal 18.0° W.L. orbital location, Intelsat 7 will be collocated with the Intelsat 901 satellite. Intelsat 7 and Intelsat 901 will operate in separate station keeping boxes, and Intelsat will coordinate their operations internally.