January 20, 2015

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

Re: Request for Further Extension of Special Temporary Authority to Operate Intelsat 7 TT&C Frequencies at 18.2° W.L.
Call Sign S2229

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days, commencing January 28, 2015, of the Special Temporary Authority ("STA")[1] previously granted Intelsat to drift Intelsat 7 (call sign S2229) from 68.65° E.L. to 18.2° W.L. and operate the satellite's TT&C frequencies at 18.2° W.L.[2] Intelsat 7 arrived on-station on December 3, 2014 and is temporarily collocated with the Intelsat 901 satellite, which currently operates at the 18.0° W.L. orbital location.[3] Intelsat has a pending STA to operate Intelsat 7's TT&C and communications frequencies at 18.2° W.L.[4]

On-station, Intelsat will continue to utilize the satellite's TT&C frequencies in conformance with its coordination agreements related to that location or on a non-interference, non-protected basis. The specific TT&C frequencies are 13998 MHz (RHCP) in the uplink and 11451 MHZ (H and LHCP) and 11453 MHz MHz (V and LHCP) in the downlink.

Grant of this STA further extension request will not result in increased risk of harmful interference. Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

---

[1] Intelsat has filed this STA request, an FCC Form 159, and a $920.00 filing fee electronically via the International Bureau's Filing System.

[2] *See Policy Branch Information; Actions Taken*, Report No. SAT-01062, File No. SAT-STA-20141222-00136 (Jan. 9, 2015); *Policy Branch Information; Actions Taken*, Report No. SAT-01025, File No. SAT-STA-20140421-00039 (June 27, 2014) (Public Notice).

[3] *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).

[4] *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01053, File No. SAT-STA-20141024-00137 (Jan. 9, 2015) (Public Notice).

Additionally, Intelsat agrees to operate Intelsat 7 at 18.2° W.L. in accordance with the frequency-related conditions in the Commission's 2004 order granting authority for the Intelsat 7 satellite to operate at 68.5° E.L.[5]

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 7 will not be located in 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 7 at 18.2° W.L. Finally, Intelsat is not aware of any system with 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.

Grant of this STA further extension request will allow Intelsat to continue providing TT&C services to the Intelsat 7 satellite at 18.2° W.L., which ensures safe station-keeping of the satellite.

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

Sincerely,

Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

[5] *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, 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.