

February 5, 2016

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 180 days, commencing March 20, 2016, of Special Temporary Authority (“STA”)¹ previously granted Intelsat to operate Intelsat 7 (S2229) at 18.2° W.L.² Although Intelsat initially will continue to collocate Intelsat 7 with the Intelsat 901 satellite that currently operates at the 18.0° W.L. orbital location,³ Intelsat expects to begin de-orbit maneuvers for Intelsat 7 during the requested extension period.⁴

Intelsat 7 is permanently licensed at 68.65° E.L.⁵ The satellite arrived on-station at 18.2° W.L. on December 3, 2014. As noted above, Intelsat expects to begin de-orbit maneuvers for the satellite during the requested extension period. During the extended STA period, Intelsat will continue to 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 will continue to

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 *Policy Branch Information; Actions Taken*, Report No. SAT-01104, File No. SAT-STA-20150710-00042 (Public Notice). Although Intelsat 7 also includes the bands 3625 – 3700 MHz, 10950 – 11200 MHz, 11450 – 11700 MHz, 13750 – 14000 MHz, and 14000 – 14250 MHz, Intelsat is not seeking authority to operate in these bands in this extension request.

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 The Commission has already approved the Intelsat 7 de-orbit to approximately 273 km. See *Policy Branch Information; Actions Taken*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Mar. 21, 2014) (Public Notice). See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Dec. 20, 2013) (Public Notice).

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Mar. 21, 2014) (Public Notice).

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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.⁶

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.

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 continued temporary operation of Intelsat 7 at 18.2° W.L. until de-orbit will allow Intelsat the flexibility to schedule the satellite's de-orbit at a time that does not conflict with the Intelsat launches that are expected to occur in the next several months. Accordingly, grant of this STA extension request is in the public interest.

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

Sincerely,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁶ 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.4.