

April 1, 2016

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

Re: Request for Special Temporary Authority to Extend the Intelsat 702 License Term

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 75 days – beginning July 18, 2016 – to extend the Intelsat 702 (S2388) license term to allow temporary continued operations at 32.9° E.L. under the terms of the Intelsat 702 permanent license.<sup>2</sup> The current license term for Intelsat 702 expires on July 18, 2016.<sup>3</sup>

Intelsat seeks temporary extension in order to de-orbit the satellite. Intelsat plans to begin de-orbit maneuvers in early September and complete de-orbit two to three weeks thereafter. The de-orbit schedule is based on current manpower/schedule constraints.

Temporarily extending the license term of the Intelsat 702 satellite will not affect the satellite’s post-mission disposal plan. As approved in the most recent Intelsat 702 license modification, Intelsat intends to dispose of the Intelsat 702 satellite by moving it to a minimum altitude of 150 kilometers above the geostationary arc and has reserved 30.22 kilograms of fuel for this purpose.<sup>4</sup> There are no single points of failure on the satellite that would affect Intelsat’s ability to de-orbit the satellite.

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will continue to operate the communications payload in conformance with its coordination agreements related to the nominal 33° E.L. orbital location.

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<sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01044, File No. SAT-MOD-20131001-00163 (Oct. 3, 2014) (Public Notice).

<sup>3</sup> See *id.*

<sup>4</sup> See Intelsat License LLC Application to Modify Authorization for Intelsat 702, Engineering Statement at 10 (stamp grant issued by Stephen J. Duall on Sept. 25, 2014).

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Grant of this STA request to extend the license will serve the public interest by allowing the continuation of operations at 32.9° E.L until Intelsat 702's scheduled de-orbit.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Crandall', with a large, stylized initial 'S'.

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers