

December 30, 2009

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



Re: Request for Special Temporary Authority
Clarksburg, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from February 4, 2010 through March 5, 2010, to use its Clarksburg, Maryland Ku-band earth station -- call sign KA258 -- to provide launch and early orbit phase ("LEOP") services for the Intelsat 16 satellite that is expected to be launched on February 4, 2010.² The LEOP period is expected to last approximately ten days.³

The Intelsat 16 LEOP operations will be performed in the following frequency bands: 13997.5 MHz and 14499.5 MHz in the uplink (LHCP), and 12198.25 MHz and 12198.75 MHz in the downlink (RHCP). The maximum uplink EIRP transmitted during the LEOP operations will be 85 dBW. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the Intelsat 16 LEOP mission is as follows:

Harry Burnham or Mike Munion
Ph.: (202) 944-7701

¹ Intelsat has filed its STA request, an FCC Form 159, a \$175.00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² The permanent orbital location for Intelsat 16 will be 58.1° W.L. *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice).

³ Intelsat is seeking authority through March 5, 2010 to accommodate a possible launch delay.

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The particulars of the proposed Intelsat 16 LEOP operations for the frequencies 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz will be in conformance with the KA258 license parameters, as reflected in Section B of the license.⁴ The points of communications listed in the license do not include communications with a satellite in non-geostationary orbit, as will be the case during the proposed LEOP operations. As such, Intelsat is providing information below to address interference potential with respect to lawfully operating co-frequency terrestrial and government radiocommunication facilities.

Specifically, operations in the frequencies 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz will not create potential interference into terrestrial services, as these frequencies are not shared with terrestrial services in the area of the proposed operations. Similarly, operations in the 13997.5 MHz frequency will not create potential interference into TDRSS forward links and the space research services because there is no frequency overlap.⁵ Additionally, the proposed operations in this frequency fully conform to the requirements of US356, with a transmitted EIRP per carrier of 85 dBW. There will be no interference into the government radiolocation services per the attached report of compliance with FCC Report & Order 96-377 regarding the 13.75-14.0 GHz band, provided as Exhibit A to this request.

The above information, as well as the relevant technical information currently on file with the Commission and herein incorporated by reference, demonstrate that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial or government facility. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this STA request will allow Intelsat to help launch the Intelsat 16 satellite to the 58.1° W.L. location. This, in turn, will help provide additional capacity at the nominal 58.0° W.L. location and thereby promote the public interest.

⁴ See File No. SES-MFS-20090616-00736.

⁵ The requirements of US337 and US357 would not apply.


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Please direct any questions regarding this STA request to the undersigned at
(202) 944-7848.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Kathryn Medley