

January 25, 2010

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



Re: Request for Special Temporary Authority
Riverside, California Earth Station E060384

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from February 21, 2010 through March 22, 2010, to use its Riverside, California Ku-band earth station -- call sign E060384 -- to provide telemetry, tracking and command ("TT&C") services for the Intelsat 16 satellite at 48.0° W.L. while the satellite undergoes in-orbit testing, as well as during the satellite's drift to and operation at its permanent location of 58.10° W.L.² Intelsat 16 is expected to be launched on February 11, 2010.

Upon launch and subject to receipt of FCC approval, Intelsat 16 will be located temporarily at 48.0° W.L. for in-orbit testing.³ The satellite's permanent location ultimately will be 58.10° W.L.⁴ The Intelsat 16 TT&C operations will be performed in the following frequency bands: 13997.5 MHz and 14499.5 MHz in the uplink and 12198.25 MHz and 12198.75 MHz in the downlink.

For 48.0° W.L., Intelsat has coordinated the proposed TT&C operations with operators of co-frequency satellites within six degrees. During the drift from 48.0° W.L. to 58.10° W.L., Intelsat has coordinated with operators of co-frequency satellites in the drift path. For 58.10° W.L., Intelsat will operate the TT&C transmissions in conformance with its coordination agreements for the nominal 58.0° W.L. location, as well as with the FCC's rules designed to allow co-frequency operations in a two-degree separation environment.

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 Intelsat will shortly file an application to modify the E060384 license to add 58.10° W.L. as a point of communication.

³ See *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20100111-00007 (filed Jan. 11, 2010).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice).

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Operations in the 14499.5 MHz, 12198.25 MHz and 12198.75 MHz frequencies will be consistent with the antenna's licensed parameters. With respect to operations in the 13997.5 MHz frequency, Intelsat is attaching Exhibit A, which contains technical information that demonstrates 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 facility.⁵ 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.

The provision of TT&C services to the Intelsat 16 satellite at 48.0° W.L., during drift, and at 58.10° W.L. is critical to ensure the safe station-keeping of the satellite while it undergoes in-orbit testing and at its permanent location. This, in turn, will result in additional capacity at the nominal 58.0° W.L. location, and thereby promotes the public interest.

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

Respectfully submitted,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Kathryn Medley

⁵ The EIRP levels for transmissions in the 13997.5 MHz frequency will be consistent with the antenna's licensed parameters.