March 12, 2010

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



Re: Request for Special Temporary Authority for Clarksburg, Maryland Earth Station, Call Sign: KA275

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 14 days—from March 15, 2010 through March 29, 2010—to use its Clarksburg, Maryland C-band earth station, call sign KA275, to provide in-orbit testing ("IOT") services for the Intelsat 25 satellite (call sign S2804) at the 31.5° W.L. orbital location.

This application for STA is being filed out of an abundance of caution to add the Intelsat 25 satellite at 31.5° W.L. as an authorized point of communication for KA275 earth station.<sup>2</sup> The KA275 earth station is already authorized to communicate with "INTELSAT AOR @ 328.5 E.L. satellite of the INTELSAT system (U.S.-licensed"). The Intelsat 25 IOT operations will be performed at 31.5° W.L. in the 3700–4200 MHz and 5925–6425 MHz bands. These conventional C-band frequencies are already included on the earth station authorization for KA275.

Grant of this STA request will serve the public interest. Grant will allow Intelsat to begin partial in-orbit testing immediately upon the arrival of Intelsat 25 at its proposed permanent operating location of  $31.5^{\circ}$  W.L. Intelsat 25 is a newly acquired in-orbit satellite. Testing is a critical step in ensuring that the satellite will be fully operational at  $31.5^{\circ}$  W.L. This, in turn, will provide customers with the benefits of additional capacity at the  $31.5^{\circ}$  W.L. location as quickly as possible.

Grant of this STA request will not result in an increased risk of harmful interference. Intelsat operates (or shortly will operate) the satellites using the

<sup>&</sup>lt;sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

<sup>&</sup>lt;sup>2</sup> Intelsat has a pending application for authority to operate Intelsat 25 at 31.5° W.L., *Intelsat North America LLC, Application for Authority to Operate Intelsat 25, an In-orbit Satellite, at 31.5° W.L.*, File No. SAT-A/O-20091223-00151 (filed Dec. 23, 2009). Intelsat is simultaneously filing an application for special temporary authority for in-orbit testing of Intelsat 25 at 31.5° W.L.

conventional C-band frequencies that are immediately adjacent to  $31.5^{\circ}$  W.L. at the 29.5° W.L. orbital location<sup>3</sup> and at the  $34.5^{\circ}$  W.L. orbital location<sup>4</sup> and thus can internally monitor and coordinate any interference to adjacent satellites.

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall Assistant General Counsel Intelsat Corporation

cc: Kathyrn Medley Stephen Duall

<sup>&</sup>lt;sup>3</sup> Application for Special Temporary Authority to Drift the Intelsat 801 Satellite to 29.5° W.L., File No. SAT-STA-20091216-00146 (stamp grant Feb. 22, 2010).

<sup>&</sup>lt;sup>4</sup> Application of Intelsat LLC to Modify Authorizations, File No. SAT-MOD-20011221-00139 (stamp grant Mar. 22, 2002) (granting Intelsat authority to operate the Intelsat 903 satellite at 34.5° W.L.).