

August 30, 2010

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



Re: Request for Special Temporary Authority  
Paumalu, Hawaii C-band Earth Station KA270

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, beginning September 2, 2010 to utilize its Paumalu, Hawaii C-band earth station to communicate with the JSAT-2A satellite -- which is licensed by Japan -- at 154° E.L. prior to grant of permanent operating authority. The antenna will utilize the frequency bands 3700-4200 MHz and 5925-6425 MHz. Intelsat will shortly file a request to modify the KA270 license to communicate with JSAT-2A in these bands on a permanent basis.

Grant of this request is in the public interest because it will allow Intelsat to provide communications services to the U.S. Government in the Pacific Ocean region. Because the U.S. Government services are scheduled to commence on this antenna on September 2, 2010, Intelsat respectfully requests expedited treatment of this STA request.

In support of this request, Intelsat attaches as Exhibit A hereto the specific technical parameters of the proposed transmissions to JSAT-2A. Grant of this request will not result in harmful interference into any lawfully operating facility. The KA270 antenna already is licensed to provide communications services in the above referenced frequencies and the technical parameters of the proposed transmissions to JSAT-2A are consistent with the antenna’s licensed parameters.<sup>2</sup> In addition, the 154° E.L. orbital location of the JSAT-2A satellite is within the coordinated arc for this antenna.<sup>3</sup> In the extremely unlikely event that harmful interference should occur, Intelsat will take all reasonable steps to eliminate the interference.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, a \$175.00 filing fee and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> See File No. SES-RWL-20090129-00096.

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

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Earth station applicants seeking to access a foreign-licensed satellite must demonstrate that “U.S.-licensed satellites have effective competitive opportunities to provide analogous services in” the “country in which the non-U.S.-licensed space station is licensed.”<sup>4</sup> Although the JSAT-2A satellite is not on the Commission’s Permitted Space Station List, the Commission previously has authorized the satellite as a point of communication for a U.S. earth station.<sup>5</sup> In addition, a Japanese-licensed satellite – Horizons 1 – is on the Permitted Space Station List.<sup>6</sup> Intelsat incorporates herein by reference the information previously filed with the Commission regarding the JSAT-2A satellite,<sup>7</sup> as well as access by foreign-licensed satellites to the Japanese market.<sup>8</sup> Because the required information previously has been filed, and to the extent necessary, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission’s rules.<sup>9</sup>

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

Respectfully submitted,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Paul Blais  
Jeanette Spriggs

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<sup>4</sup> See 47 C.F.R. § 25.137(a)(1).

<sup>5</sup> See File No. SES-LIC-20030418-00503.

<sup>6</sup> See *Horizons Satellite LLC Petition for Declaratory Ruling to Add Horizons I to the Permitted Space Station List*, Order, 18 FCC Rcd 24,745, 24,748 (¶ 8) (2003) (“We conclude that Horizons 1’s proposed entry for purposes of offering fixed-satellite services, excluding DTH, will enhance competition for these services in the U.S. market.”). See also *Horizons Satellite LLC Application for Modification of Permitted List Authorization*, Order and Authorization, 19 FCC Rcd 20,349 (2004).

<sup>7</sup> See File No. SES-LIC-20030418-00503.

<sup>8</sup> See File No. SAT-PDR-20030210-00015 (requesting FSS market access for Horizons 1).

<sup>9</sup> 47 C.F.R. §§ 25.137 and 25.114.