

November 26, 2012

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



Re: Request for Special Temporary Authority to De-Orbit the Intelsat 707  
Satellite, Call Sign S2398

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> herein requests Special Temporary Authority (“STA”), beginning on January 10, 2013, and lasting for a period of thirty days, in order to de-orbit the Intelsat 707 satellite (Call Sign S2398) from its current location at 53.0° W.L. and to perform telemetry, tracking and command (“TT&C”) functions with Intelsat 707 during this maneuver.

Grant of this STA is in the public interest. The Intelsat 707 satellite was launched in March 1996 and is nearing the end of its useful life. Accordingly, Intelsat seeks to commence de-orbiting in the first quarter of 2013. The Intelsat 707 satellite is being replaced by the Intelsat 23 satellite (call sign S2831), which was recently launched and is expected to begin commercial service in November 2012.<sup>2</sup> The customers currently receiving services on Intelsat 707 will be transferred to Intelsat 23 at 53.0° W.L. prior to the de-orbit of Intelsat 707.

Intelsat intends to de-orbit the Intelsat 707 satellite to a perigee of at least 150 km above synchronous altitude.<sup>3</sup> This perigee was selected based on Intelsat’s propellant accounting, recent experience with Intelsat 707’s maneuver performance, and calculations of the current fuel situation. All remaining fuel will be used for de-orbiting maneuvers. If there is enough fuel left to do so, the Intelsat 707 satellite will be taken to a perigee higher than 150 km. As a satellite

<sup>1</sup> 47 C.F.R. § 25.120.

<sup>2</sup> See *Policy Branch Information Actions Taken*, Report No. SAT-00848, DA No. 12-268, File No. SAT-LOA-20110727-00139 (Feb. 24, 2012) (Public Notice).

<sup>3</sup> The Commission has suggested that 150 km above synchronous altitude is acceptable for satellites launched prior to March 18, 2002. See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567, ¶ 82 (2004).

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Ph.: (202) 944-7701 – East Coast Operations Center (primary)  
(310) 525-5900 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

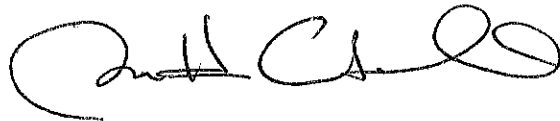
In further support of this request, Intelsat is attaching Exhibits A and B, which contain a waiver request, as well as technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. 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.

Intelsat also notes that for purposes of the Yamal-402 LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 26.5 dBW. The technical information submitted with the STA request reflects a power level as high as 34.0 dBW because that is the level at which Intelsat might operate in the event an emergency necessitates the use of a higher power level in order to command the satellite.

Grant of this STA request will enable Intelsat to help launch the Yamal-402 satellite. This will serve the public interest by ensuring that it can bring additional capacity to Russia, Europe and the Middle East.

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: Paul Blais