

January 18, 2013

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



Re: Request for Special Temporary Authority
Hagerstown, Maryland Earth Station KA264

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days commencing February 15, 2013 to use its Hagerstown, Maryland C-band earth station -- call sign KA264 -- prior to grant of permanent authority² to provide temporary telemetry, tracking and control (“TT&C”) services for the Intelsat 27 satellite during the satellite’s (1) in-orbit testing at 51.5° W.L., (2) drift to 55.5° W.L., and (3) commencement of operations at 55.5° W.L.³ Intelsat 27 is expected to be launched on January 30, 2013.⁴

The Intelsat 27 temporary TT&C operations will be performed in the following frequency bands:

Uplink: 6424.5 MHz (LHCP) and 5925.5 MHz (H); and
Downlink: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, and 3702.75 MHz (V and LHCP).

¹ Intelsat has filed its STA request, an FCC Form 159, a \$180.00 filing fee and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² Intelsat has a pending modification application to authorize its use of KA264 after the antenna’s relocation from Clarksburg, Maryland to Hagerstown, Maryland. *See* Intelsat License LLC Request for Modification of KA264 License, File No. SES-MOD-20130117-00057 (filed Jan. 16, 2013).

³ Long-term TT&C for Intelsat 27 will be handled with a different earth station.

⁴ The satellite’s permanent orbital location will be 55.5° W.L. *See Policy Branch Information; Actions Taken*, Report No. SAT-00904, File No. SAT-LOA-20110610-00105 (Oct. 12, 2012) (Public Notice). The FCC’s order granting the Intelsat 27 license prohibits Intelsat from operating the UHF payload without further order from the FCC. *See id.*, Condition # 4. Intelsat 27’s C- and Ku-band payloads will be in-orbit tested at 51.5° E.L. *See Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20121130-00204 (filed Nov. 30, 2012). The satellite’s UHF payload will be tested at 55.5° W.L., subject to receipt of FCC approval.

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The Intelsat 27 temporary TT&C operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift 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 27 temporary TT&C mission is as follows:

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 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. Intelsat also incorporates herein by reference the technical information submitted with its application for permanent authority to relocate KA264. 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 proposed Intelsat 27 temporary TT&C transmissions, 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 higher power level of 30.3 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.

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Grant of this STA request will allow Intelsat to help in-orbit test Intelsat 27 and drift the satellite to its permanent location. This, in turn, will serve the public interest by providing replacement and new capacity at the satellite's permanent location of 55.5° W.L.

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