January 22, 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 KA258

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 Ku-band earth station -- call sign KA258 -- to provide in-orbit testing ("IOT") services for the Intelsat 27 satellite that is scheduled to be launched on January 30, 2013.² The in-orbit testing will be conducted at the 51.5° W.L. orbital location in the following bands: 11450-11700 MHz, 11700-12200 MHz (downlink), 12500-12700 MHz, ³ and 14000-14500 MHz (uplink).

The Intelsat 27 IOT operations have been coordinated with all operators of satellites that use the same frequency bands located within six degrees of 51.5° W.L. To Intelsat's knowledge, the only co-frequency satellites within plus/minus six degrees of 51.5° W.L. are Intelsat 23 at 53.0° W.L., Intelsat 805 at 55.5° W.L., Galaxy 11 at 55.5° W.L., Intelsat 1R at 50.0° W.L., NSS 703 at 47.05° W.L., TDRS 3 at 49.0° W.L., and Inmarsat 3-F4 at 54.0° W.L. Intelsat has coordinated the Intelsat 27 IOT with SES World Skies, the operator of NSS 703; Inmarsat, the operator of Inmarsat 3-F4; and the United States Government, the operator of TDRS 3, regarding the Intelsat 27 C/Ku-band IOT. With regard to the remaining spacecraft, Intelsat has internally coordinated the proposed testing with the operations of these satellites. In the unlikely event that harmful

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 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 no. 4. The satellite's UHF payload will be tested at 55.5° W.L., subject to receipt of FCC approval.

³ Intelsat will not test the 12700-12750 MHz band using this antenna.

⁴ See Intelsat License LLC Request for Special Temporary Authority, File No. SAT-STA-20121130-00204 (filed Nov. 30, 2012).

Ms. Marlene H. Dortch January 22, 2013 Page 2

interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Grant of this STA request will allow Intelsat to in-orbit test the Intelsat 27 satellite. This, in turn, will help ensure that the satellite is fully operational at its permanent location of 55.5° E.L. and thus serves 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: Paul Blais