January 24, 2013

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



Re: Request for Special Temporary Authority to Utilize Hagerstown, Maryland UHF Antenna to In-orbit Test the Intelsat 27 Satellite

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from March 15, 2013 through April 13, 2013, to utilize a UHF antenna located at Intelsat's Hagerstown, Maryland teleport to conduct in-orbit testing ("IOT") of the UHF-band payload of the Intelsat 27 satellite (Call Sign S2827) at the 55.5° W.L. location² in the following channels/frequencies:

CHANNEL 3: M252.355 DL M293.355 UL 5kHz BW CHANNEL 4: M252.365 DL M293.365 UL 5kHz BW CHANNEL 5: M252.375 DL M293.375 UL 5kHz BW CHANNEL 6: M252.385 DL M293.385 UL 5kHz BW CHANNEL 12: M258.050 DL M299.050 UL 25kHz BW CHANNEL 13: M258.875 DL M299.875 UL 25kHz BW

Intelsat 27 currently is scheduled to be launched on January 30, 2013. In support of its request, Intelsat submits the following information.

During in-orbit testing of the Intelsat 27 UHF-band payload at 55.5° W.L., Intelsat will operate in UHF only in the above referenced channels/frequencies.³ Intelsat's Hagerstown, Maryland UHF antenna will

³ Intelsat has a separate request pending for space station STA to test the Intelsat 27 UHF C- and Ku-band payloads at 51.5° W.L. *See Intelsat*

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

² 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 space station license prohibits Intelsat from operating the UHF payload without further order from the FCC. *See id.*, Condition # 4. Intelsat therefore is concurrently filing a space station STA request seeking authority to operate the Intelsat 27 UHF channels/frequencies identified herein for IOT purposes.

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be the only earth station performing the UHF payload IOT. The U.S. Department of Defense will be able to monitor and, if need be, instruct Intelsat to cease IOT transmissions in the event of interference with U.S. Government operations. Intelsat provides the following 24-hour stop buzzer point of contact for the Intelsat 27 UHF payload IOT.

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Intelsat would agree to the following conditions being included in a grant of the STA requested herein:

- 1. The STA is only to be used to support the IOT testing of the UHF payload on the satellite.
- 2. Any use of this UHF capability after the IOT testing period requires the filing of an application for modification of license and affirmative authorization and/or consent of the FCC.
- 3. The testing of the Intelsat 27 UHF payload shall be on a non-protected/non-interference basis.

In further support of this request, Intelsat attaches a radiation hazard report as Exhibit A. 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.

The in-orbit testing of Intelsat 27's UHF-band payload at 55.5° W.L. is a critical step in ensuring that the UHF payload will be fully operational. This, in turn and subject to FCC further approval, will make UHF capacity available to customers at the 55.5° W.L. location, and thereby promotes the public interest.

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

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

1. 1

Sincerely,

Susan H. Crandall Assistant General Counsel Intelsat Corporation

cc: Paul Blais Robert Nelson Ed Davison Kathyrn Medley Stephen Duall Jay Whaley Cindy Spiers