

AMENDMENT

PanAmSat Licensee Corp., Application to Modify Authorization for Intelsat 1R to Relocate to 50.0° W.L., IBFS File No. SAT-MOD-20090720-00073 (Call Sign S2368)

This amendment responds to the International Bureau's ("Bureau") October 30, 2009 request for additional information regarding PanAmSat Licensee Corp.'s ("PanAmSat") above-referenced application.¹

The Bureau asks PanAmSat to "provide the specific disposal altitude to which 4.3 kilograms of reserve fuel corresponds."² 4.3 kilograms of reserve fuel corresponds to an altitude of 300 kilometers above the geostationary arc.

The Bureau also asks PanAmSat to "submit an analysis of the long-term evolution (100 years or more) of the orbit for the Intelsat 1R satellite."³ In the Erratum filed August 4, 2009, PanAmSat expressed the specified disposal altitude of Intelsat 1R as a range of 100-300 kilometers above the geostationary arc because, as the Commission is aware, there is no mechanism for precisely calculating the amount of fuel left on the spacecraft once it is in orbit. In good faith, PanAmSat will reserve 4.3 kilograms of fuel and expects to obtain a de-orbit altitude for the Intelsat 1R satellite of 300 kilometers above the geostationary arc. PanAmSat employs standard industry methods, in cooperation with the satellite manufacturer, to account for and calculate remaining fuel. Although unlikely, it is possible that despite PanAmSat's best efforts the Intelsat 1R spacecraft will not meet the planned 300 kilometer de-orbit altitude. PanAmSat believes that the long-term evolution analysis for the planned de-orbit of Intelsat 1R at 300 kilometers is well known to the Commission and consequently is not providing it with this Amendment.⁴ To the extent that, notwithstanding PanAmSat's reservation of fuel corresponding to an altitude of 300 kilometers above the geostationary arc, the FCC requests a long-term evolution analysis for an altitude lower than 300 kilometers above geostationary arc, PanAmSat would be pleased to provide it.⁵

¹ Letter from Robert G. Nelson, Chief, Satellite Division, International Bureau, FCC to Jennifer D. Hindin, Counsel to PanAmSat Licensee Corp., IBFS File No. SAT-MOD-20090720-00073 (dated Oct. 30, 2009).

² *Id.* at 1.

³ *Id.* at 2.

⁴ See Letter from Robert G. Nelson, Chief, Satellite Division, International Bureau, FCC to Jennifer D. Hindin, Counsel to PanAmSat Licensee Corp., DA 09-2363, IBFS File No. SAT-MOD-20090910-00097 (dated Oct. 30, 2009) (requesting an analysis of the long-term evolution (100 years or more) of the orbit for the Galaxy 11 satellite only "to the extent [PanAmSat] plans to dispose of the Galaxy 11 satellite at an orbit of less than 150 kilometers").

⁵ PanAmSat notes that preparation of the long-term evolution analysis would take several weeks and that PanAmSat seeks to relocate the Intelsat 1R satellite this year following the successful launch of Intelsat 14 currently scheduled for November 14, 2009.