

REQUEST FOR PARTIAL WAIVER OF SECTION 25.283(c) OF THE COMMISSION'S RULES

Pursuant to Section 1.3 of the Commission's rules, Telesat Canada ("Telesat") hereby requests partial waiver of Section 25.283(c) of the Commission's rules to the extent that the rule requires Telesat to vent at end-of-life any remaining helium pressurant on its Anik F3 spacecraft (FCC call signs S2829 and S2703). Section 1.3 of the Commission's rules provides that any Commission rule may be waived for "good cause" shown. Telesat's waiver request is supported by good cause due to the practical impossibility of complying with the strict letter of the rule.

Section 25.283(c) requires that after the completion of a satellite mission "all stored energy sources on board the satellite are discharged, by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures." AnikF3 is an EADS Astrium E3000 satellite that was launched on April 9, 2007. Pursuant to the spacecraft's fuel system design, the pressurant (helium) tank was isolated from the fuel system after the satellite reached the geostationary orbit, that is, a few days after its launch. The isolated helium pressurant tank retains a total mass of helium of 1.56 kg with a volume of 0.179 cubic meters at the end of life. The fuel system design prevents Telesat from venting the helium in the now-isolated helium tank by any means short of attempted spacecraft retrieval. Given these circumstances, it would impose on an undue burden on Telesat to require it to vent remaining pressurant.

Telesat will, however, vent all propellant (both the fuel and the oxidant) at the end of its satellite's life, and will leave open all propulsion lines and latch valves after venting them. All battery chargers will be turned off and batteries will be left in a permanent discharge state.

Telesat notes that the FCC has granted a waiver in almost identical circumstances for the AMAZONAS-2 spacecraft.¹ The FCC determined in that case to "grant a partial waiver of the rule because undue hardship would result from requiring modification of the space station at this time."² Telesat respectfully submits that a similar waiver is justified here.

¹ Amazonas-2, SAT-PPL-20100506-00093 and SAT-APL-20101209-00257 (grant stamp dated December 21, 2010).

² *Id.* at ¶ 1.