



Federal Communications Commission
Washington, D.C. 20554

October 30, 2009

Ms. Jennifer D. Hindin
Wiley Rein LLP
1776 K Street, NW
Washington, D.C. 20006-3006

Re: 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)

Dear Ms. Hindin:

On July 20, 2009, PanAmSat Licensee Corp. (PanAmSat) filed the above-captioned application. In the application, PanAmSat proposes to relocate its authorized satellite, Intelsat 1R, from its current location at 45.0° W.L. to the 50.0° W.L. orbital location. On August 4, 2009, PanAmSat filed an Erratum to amend information about the Post Mission Disposal of Intelsat 1R. Pursuant to Section 25.111(a) of the Commission's rules, 47 C.F.R. § 25.111 (a), we request that PanAmSat provide, by amendment, additional information to allow the Commission to continue to process the application.

Section 25.114(d)(14)(iv) of the Commission's rules, 47 C.F.R. § 25.114(d)(14)(iv), requires entities to include in their statement detailing the post-mission disposal plans for the geostationary-Earth orbit space station's end of life, "the quantity of fuel – if any – that will be reserved for post-mission disposal maneuvers.... [T]he statement must disclose the altitude selected for a post-mission disposal orbit and the calculations that are used in deriving the disposal altitude." In its July 20 modification application, PanAmSat indicated that 4.3 kilograms of fuel will be reserved in order to dispose of Intelsat 1R by moving it to a minimum altitude of 300 kilometers above the geostationary arc. However, in the subsequent Erratum, PanAmSat changed the specified disposal altitude of Intelsat 1R to a range of 100-300 kilometers above the geostationary arc, but retained the same 4.3 kilograms of reserve fuel to dispose of the satellite anywhere within the 100-300 kilometer range. We request PanAmSat to provide the specific disposal altitude to which 4.3 kilograms of reserve fuel corresponds in an amendment to its modification application.

We note that the Commission did not specify a minimum altitude for disposal of grandfathered satellites in the *Orbital Debris Order*.¹ However, the Commission emphasized that "[t]he stated current practice of several U.S. operators is, barring catastrophic hardware failures, to execute end-of-life maneuvers that result in a disposal altitude of no less than 150 kilometers above" the

¹ Mitigation of Orbital Debris, *Second Report and Order*, IB Docket No. 02-54, 19 FCC Rcd 11567 (2004) (*Orbital Debris Second Report and Order*).

geostationary altitude.² The Commission also noted variations in the stated practices at that time of space station operators, with minimum perigee targets ranging from 100-192 kilometers above the geostationary altitude. The Commission stated that “[a]lthough operators claim that such minimum disposal altitudes are sufficient to protect the geostationary earth orbit, the target orbits, particularly those in the lower end of this range, could, in fact, result in decommissioned spacecraft drifting back into altitudes at which active ... spacecraft operate.”³ Accordingly, we request that PanAmSat submit an analysis of the long-term evolution (100 years or more) of the orbit for the Intelsat 1R satellite, taking into account perturbing forces such as gravitational effects and solar radiation pressure, and focusing in particular on perigee altitude. Please also provide an analysis of the potential risks or constraints this satellite would present for operational geostationary spacecraft, based upon the evolution of the orbit.

We request that PanAmSat respond to this letter by Monday, November 30, 2009. Failure to do so may result in the dismissal of the application in its entirety pursuant to Section 24.112(c) of the Commission’s rules, 47 C.F.R. § 25.112(c).

Sincerely,

Robert G. Nelson
Chief, Satellite Division
International Bureau

² *Id.* at 11600-01. See also Disclosure of Orbital Debris Mitigation Plans, Including Amendment of Pending Applications, International Bureau Satellite Division Information, *Public Notice*, Report No. SPB-112, DA 05-2698, October 13, 2005. The Commission also noted that a number of operators had exceeded that minimum. *Orbital Debris Second Report and Order*, 19 FCC Rcd at 11600 n.208 (noting disposals in excess of 300 kilometers above GSO by SES Americom and Intelsat).

³ *Id.* at 11597 n.191.