



Federal Communications Commission
Washington, D.C. 20554

January 11, 2010

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,
IBFS File No. SAT-MOD-20090720-
00073 (Call Sign: S2368)

Dear Ms. Hindin:

On November 13, 2009, PanAmSat Licensee Corp. (PanAmSat) filed an amendment to the above-captioned application to modify the operations of the Intelsat 1R satellite by relocating the satellite to the 50.0° W.L. orbital location.¹ The amendment provided additional information concerning the disposal attitude of the Intelsat 1R satellite.² Pursuant to Section 25.111(a) of the Commission's rules, 47 C.F.R. § 25.111 (a), we request that PanAmSat provide, by letter, additional information to facilitate processing the application.

The Commission has found that the public interest is served by having space station operators disclose, as part of applications for Commission authorizations, the quantity of fuel they intend to reserve for post-mission disposal of their spacecraft, as well as the methodology used to derive that quantity, including the methods used to determine and address fuel gauging uncertainty.³ In applying this requirement, the Bureau has stated that, with regard to methods to determine and address fuel gauging uncertainty, "the Satellite Division will consider as sufficient a statement that the operator has assessed fuel gauging uncertainty and has provided an adequate margin of fuel reserve to address the assessed uncertainty."⁴ In its November 13 Amendment, PanAmSat states that it will "in good faith reserve 4.3 kilograms of fuel [for post-mission disposal of the Intelsat 1R satellite] and expects to obtain a de-orbit altitude for the Intelsat 1R satellite of 300 kilometers above the geostationary arc." PanAmSat also states that it "employs standard industry methods, in cooperation with the satellite manufacturer, to account for and calculate remaining fuel."⁵

¹ IBFS File No. SAT-AMD-20091113-00122 (November 13 Amendment).

² Letter from Robert G. Nelson, Chief, Satellite Division, to Jennifer D. Hindin, Counsel to PanAmSat, dated October 30, 2009.

³ *Mitigation of Orbital Debris*, Second Report and Order, IB Docket No. 02-54, 19 FCC Rcd 11567, 11604 (2004) (*Orbital Debris Second Report and Order*). The Commission concluded that such a requirement serves the public interest by demonstrating, prior to receiving Commission authorization, that the space station operator has adequately planned for the post-mission disposal of its spacecraft. *Id.*

⁴ 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.

⁵ IBFS File No. SAT-AMD-20091113-00122.

PanAmSat did not indicate, however, whether the standard industry methods include methods used to determine and address fuel gauging uncertainty, nor did it describe any such methods. PanAmSat also did not indicate that it had assessed fuel gauging uncertainty and provided an adequate margin of fuel reserves.

In order to determine whether the proposed post-mission disposal plans for the Intelsat 1R satellite serve the public interest, we seek information about the methodology used by PanAmSat to determine and address fuel gauging uncertainty. Alternatively, PanAmSat may provide a statement that it has assessed fuel gauging uncertainty, and provided an adequate margin of fuel reserves to address that uncertainty.

We request that PanAmSat respond to this letter by February 8, 2010. 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,

A handwritten signature in black ink, appearing to read 'R. Nelson', followed by a long horizontal line extending to the right.

Robert G. Nelson
Chief, Satellite Division
International Bureau