

S2733 SAT-RPL-20070222-00035 IB2007000494
PanAmSat Licensee Corp.
GALAXY 18

Approved by OMB
3060-0678

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Callsign/Satellite ID: S2733

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only
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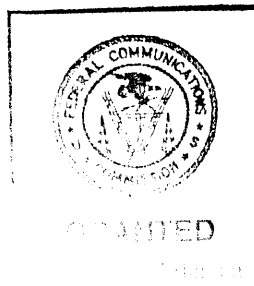
APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

PanAmSat Application for Authority to Operate Replacement Satellite Galaxy 18 at 123 W.L.

1-8. Legal Name of Applicant			
Name:	PanAmSat Licensee Corp.	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

1



File # SAT-RPL-20070222-00035

Call Sign S2733 Grant Date 10/18/07
(or other identifier)

From Launch Term Dates To: + 15 years
Operational

Approved: [Signature]
Policy Branch Chief

Attachment
Conditions of Authorization
IBFS File No. SAT-RPL-20070222-00035
PanAmSat Galaxy 18
Call Sign: S2733
October 18, 2007

PanAmSat Licensee Corp.'s (PanAmSat) request to launch and operate a C and Ku-band satellite, Galaxy 18, IBFS File No. SAT-RPL-20070222-00035 (Call Sign S2733), to be located at the 123° W.L. orbital location, IS GRANTED. Accordingly, PanAmSat is authorized to provide Fixed Satellite Services (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) frequency bands, using the Galaxy 18 satellite at the 123° W.L. orbital location, in accordance with the technical specifications set forth in the application, this Attachment, and the Commission's Rules and subject to the following conditions:

1. PanAmSat shall operate the Galaxy 18 satellite at the 123° W.L orbital location in compliance with all existing and future coordination agreements for that location.
2. PanAmSat shall prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. PanAmSat shall be held responsible for all cost-recovery fees associated with these ITU filings. We also note that no protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. *See* 47 C.F.R. §25.111(b).
3. PanAmSat shall maintain the Galaxy 18 spacecraft at the 123° W.L. orbital location with an east/west longitudinal station-keeping tolerance of 0.05 degrees. *See* 47 C.F.R. §25.210(j).
4. Galaxy 18 must begin providing service at the 123° W.L. orbital location in the C- and Ku-bands before the satellite it is replacing discontinues service at the 123° W.L. orbital location.¹ Failure to meet this milestone date shall render this authorization null and void.

¹ Among other things, a replacement satellite is one that is scheduled to be launched so that it will be brought into use at approximately the same time as, but no later than, the existing satellite is retired. 47 C.F.R. § 25.165(e)(2).

5. PanAmSat's request for waiver of Section 25.210(i), of the Commission's rules, 47 C.F.R. § 25.210(i), IS GRANTED as conditioned. Section 25.210(i) directs, "Space station antennas in the Fixed-Satellite Service must be designed to provide a cross-polarization isolation such that the ratio of the on axis co-polar gain to the cross-polar gain of the antenna in the assigned frequency band shall be at least 30 dB within its primary coverage area." PanAmSat indicates that the cross-polarization isolation ratio for Galaxy 18's C-band receive antenna is at least 30 dB in its primary coverage area, except for east Massachusetts, where it is greater than 29 dB. In addition, Galaxy 18's Ku-band receive antenna provides a cross-polarization isolation ratio of at least 30 dB in its primary coverage area, except for Hawaii, where it is equal to or greater than 27 dB. Galaxy 18's Ku-band transmit antenna provides a cross-polarization isolation ratio of at least 30 dB in its primary coverage area, except for sections of eastern Canada, where it is equal to or greater than 26 dB. We find that this will only affect PanAmSat and will not adversely affect any other operator. As a condition of the grant of this waiver, PanAmSat must accommodate future satellite networks serving the United States that are two-degree compliant. Grant of this waiver request is consistent with our precedent.²

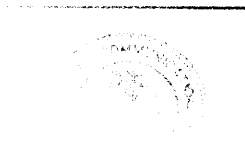
6. PanAmSat's request for waiver of Section 25.114(d)(3) of the Commission's rules, 47 C.F.R. 25.114(d)(3), IS GRANTED as conditioned. Section 25.114(d)(3) requests each applicant to provide "Predicted space station antenna gain contour(s) for each transmit and each receive antenna beam and nominal orbital location requested." PanAmSat's omni antenna diagrams (Exhibits 6K and 6M) were not prepared in accordance with Section 25.114 (d)(3) of the Commission's Rules. PanAmSat seeks a waiver of this requirement stating that the satellite manufacturer did not provide contours in the required form because pointing of the omni antennas with respect to the Earth will vary during emergencies. Under these specific circumstances, we find that Exhibits 6K and 6M, together with the descriptive characterization provided in Section 2.7.1 of the application,³ fulfill the requirements of Section 25.114(d)(3). Grant of this waiver request is consistent with out precedent.⁴

² Star One S.A.; Petition for Declaratory Ruling to Add The Star One C1 Satellite at 65° W.L. to the Permitted Space Station List, *Order*, 19 FCC Rcd 16334 (Int'l Bur., Sat. Div. 2004) (finding that the impact on neighboring satellite systems of a 3-5dB difference from the required cross polarization isolation ratio would be negligible).

³ See PanAmSat Licensee Corp. Application for Authorization to Launch and Operate Its Galaxy 18 Satellite (Call Sign: S2733) at 123° W.L., IBFS File No. SAT-RPL-20070222-0035, Engineering Statement at 12-13.

⁴ SES Americom, Inc., Application for Modification of Space Station Authorization, *Order and Authorization*, 19 FCC Rcd 20377, 20378-79 (paras. 5-8) (Int'l Bur., Sat. Div. 2004).

7. The license term for the space station is 15 years and will begin on the date PanAmSat certifies to the Commission that the satellite has been successfully placed into orbit and its operation fully conforms to the terms and conditions of this authorization. PanAmSat is directed to file its certification of commencement of operation with the Commission within 5 business days of the satellite being placed into operation at the 123° W.L. orbital location.
8. PanAmSat is afforded thirty days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
9. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.



File # SAT-RPL-20070222-00035

Call Sign S2733 Grant Date 10/18/07

(operator identifier)

Term Dates

launch + operation To 15 years

Paul L. Key
Policy Branch Chief

w/conditions

9-16. Name of Contact Representative

Name:	Jennifer D. Hindin	Phone Number:	202-719-4975
Company:	Wiley Rein LLP	Fax Number:	202-719-7207
Street:	1776 K Street, NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -
Attention:		Relationship:	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a.
(N/A) a1. Earth Station
 a2. Space Station

- b.
 b1. Application for License of New Station
(N/A) b2. Application for Registration of New Domestic Receive-Only Station
(N/A) b3. Amendment to a Pending Application
(N/A) b4. Modification of License or Registration
(N/A) b5. Assignment of License or Registration
(N/A) b6. Transfer of Control of License or Registration
(N/A) b7. Notification of Minor Modification
(N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite

 b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
 b10. Replacement Satellite Application - no new frequency bands
 b11. Replacement Satellite Application - new frequency bands (Not eligible for streamlined processing)
 b12. Petition for Declaratory Ruling to be Added to the Permitted List
(N/A) b13. Other (Please specify)

<p>17c. Is a fee submitted with this application?</p> <p><input checked="" type="radio"/> If Yes, complete and attach FCC Form 159.</p> <p>If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).</p> <p><input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee</p> <p><input type="radio"/> Other (please explain):</p>		
<p>17c. Fee Classification BNY – Space Station (Geostationary)</p>		
<p>18. If this filing is in reference to an existing station, enter:</p> <p>(a) Call sign of station: Not Applicable</p>		
<p>19. If this filing is an amendment to a pending application enter:</p> <table><tr><td>(a) Date pending application was filed: Not Applicable</td><td>(b) File number of pending application: Not Applicable</td></tr></table>	(a) Date pending application was filed: Not Applicable	(b) File number of pending application: Not Applicable
(a) Date pending application was filed: Not Applicable	(b) File number of pending application: Not Applicable	

TYPE OF SERVICE

<p>20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:</p> <p><input checked="" type="checkbox"/> a. Fixed Satellite</p> <p><input type="checkbox"/> b. Mobile Satellite</p> <p><input type="checkbox"/> c. Radiodetermination Satellite</p> <p><input type="checkbox"/> d. Earth Exploration Satellite</p> <p><input type="checkbox"/> e. Direct to Home Fixed Satellite</p> <p><input type="checkbox"/> f. Digital Audio Radio Service</p> <p><input type="checkbox"/> g. Other (please specify)</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one.</p> <p><input type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply.</p> <p>Not Applicable</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:</p> <p><input type="radio"/> Connected to a Public Switched Network <input type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A</p>	
<p>24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).</p> <p><input checked="" type="checkbox"/> a. C-Band (4/6 GHz) <input checked="" type="checkbox"/> b. Ku-Band (12/14 GHz)</p> <p><input type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.)</p> <p>Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)</p>	

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

(N/A) a. Fixed Earth Station
(N/A) b. Temporary-Fixed Earth Station
(N/A) c. 12/14 GHz VSAT Network
(N/A) d. Mobile Earth Station
 e. Geostationary Space Station.
 f. Non-Geostationary Space Station
 g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Not Applicable

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.) Not Applicable

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

Yes No
Sch. S Inputs

ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes No

Engineering Statemnt

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. Yes No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43. Yes No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

PanAmSat Licensee Corp. hereby applies for authority to launch and operate a replacement C/Ku-band satellite, to be known as Galaxy 18, at the 123 degrees W.L. orbital location. Galaxy 18 is a replacement satellite for Galaxy 10R, which is projected to reach the end of its useful life in 2008.

Legal Narrative

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Susan H. Crandall

46. Title of Person Signing
Assistant General Counsel, Intelsat Corporation

47. Please supply any need attachments.

1:

2:

3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Completed Schedule S

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

PanAmSat Licensee Corp.

Application for Authority to Launch and
Operate a Replacement Satellite at
123° W.L.

File No. SAT-RPL- _____

**APPLICATION FOR AUTHORITY TO LAUNCH
AND OPERATE A REPLACEMENT SATELLITE AT 123° W.L.**

PanAmSat Licensee Corp. (“PanAmSat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Galaxy 18, at the 123° W.L. orbital location. Galaxy 18 is scheduled for launch in the third quarter of 2007 and will replace Galaxy 10R (call sign S2378), which is projected to reach the end of its useful life in 2008. As demonstrated below, PanAmSat is legally and technically qualified to launch and operate its proposed replacement satellite. Moreover, grant of this application will serve the public interest by ensuring continuity of service to U.S. consumers at 123° W.L. In accordance with the requirements of the Commission’s rules,² this modification application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

I. BACKGROUND

PanAmSat currently holds a license to operate from the 123° W.L. orbital location. In January 2000, following Commission authorization, PanAmSat successfully launched Galaxy

¹ See 47 C.F.R. § 25.114.

² 47 C.F.R. § 25.114(c).

10R to the 123° W.L. orbital location.³ Galaxy 10R was a replacement satellite for Galaxy 10, which suffered a launch failure, which in turn was a replacement for SBS-5, which reached the end of its useful life.⁴ Galaxy 10R is projected to reach the end of its useful life in 2008.

By this application, PanAmSat seeks to ensure continuity of service at the 123° W.L. orbital location by launching and operating Galaxy 18, a replacement satellite, at that location. PanAmSat will transfer Galaxy 10R's customers to Galaxy 18 before the end of Galaxy 10R's useful life. To that end, PanAmSat's indirect parent -- Intelsat Corporation (formerly PanAmSat Corporation) -- has contracted with Space Systems/Loral to construct the replacement satellite and pre-storage construction is complete. Galaxy 18 will be a C/Ku-band satellite and will operate on a non-common carrier basis.⁵

II. PANAMSAT IS QUALIFIED TO HOLD THE REPLACEMENT AUTHORIZATION REQUESTED HEREIN

A. Legal Qualifications

PanAmSat is legally qualified to hold the replacement space station authorization requested in this application. The information provided in the attached Form 312 demonstrates PanAmSat's compliance with the Commission's basic legal qualifications. In addition,

³ *PanAmSat Corporation Application for Authority to Launch and Operate a Replacement C/Ku Hybrid Fixed Satellite Service Space Station at 123° W.L.*, Order and Authorization, DA 00-91 (Sat. & Radiocomm'n. Div. rel. Jan. 18, 2000).

⁴ *Id.*, ¶ 2.

⁵ Because Galaxy 18, like all other satellites licensed to PanAmSat, will operate on a non-common carrier basis, Section 310(b) is not applicable to this license. See *Applications of The News Corporation Limited and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 (n. 5) (Int'l Bur. 2004) ("*PanAmSat Public Notice Grant*").

PanAmSat already holds multiple Commission satellite licenses, and its “legal qualifications are a matter of record” before the Commission.⁶

B. Technical Qualifications

In the attached Form 312, Schedule S, and Engineering Statement, PanAmSat demonstrates that it is technically qualified to hold the authorization requested herein. Specifically, PanAmSat provides the information currently required by Section 25.114 of the Commission’s rules. In addition, PanAmSat’s Engineering Statement provides information on its compliance with the Commission’s orbital debris mitigation rules.⁷

C. Other Requirements

PanAmSat also meets all other applicable space station licensing requirements. For example, PanAmSat will meet the milestone schedule set forth in Section 25.164 of the Commission’s rules.⁸ Indeed, PanAmSat already has taken steps toward completing these milestones in that its indirect parent has contracted with Space Systems/Loral to build the satellite and pre-storage construction is complete. PanAmSat also notes that it is not subject to

⁶ *PanAmSat Corporation, Application for Authority to Launch and Operate a Replacement C/Ku Hybrid Fixed Satellite Service Space Station at 99 [degrees] W.L.*, Order and Authorization, 15 FCC Rcd 16577, ¶ 3 (Sat. Div. 2000) (finding that PanAmSat’s former parent company, PanAmSat Corporation, is “legally, financially, technically and otherwise qualified” to launch and operate a replacement satellite); *see also Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, FCC 06-85, ¶ 23 (rel. June 19, 2006) (“The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.”) (citing *PanAmSat Public Notice Grant* at 15425; *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion, Order and Authorization, 15 FCC Rcd 15460 (2000), recon. denied, 15 FCC Rcd 25234 (2000); *Intelsat, Ltd., Transferor, and Zeus Holdings Limited, Transferee, Consolidated Application for Consent to Transfers of Control of Holders of Title II and Title III Authorizations and Petition for Declaratory Ruling Under Section 310 of the Communications Act of 1934, As Amended*, Order and Authorization, 19 FCC Rcd 24820 (Int’l Bur., WTB and OET 2004).

⁷ *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

⁸ 47 C.F.R. § 25.164.

the bond posting requirements of Section 25.165 because Galaxy 18 is a replacement satellite.⁹

PanAmSat therefore meets all of the requirements necessary for grant of this application.

III. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

The Commission recognizes a “replacement expectancy” in orbital locations in order to protect the large investments made by satellite operators. The agency has stated,

[G]iven the huge costs of building and operating satellite space stations, there should be some assurance that operators will be able to continue to serve their customers. The Commission has therefore stated that, when the orbit location remains available for a U.S. satellite with the technical characteristics of the proposed replacement satellite, it will generally authorize the replacement satellite at the same location.¹⁰

In this case, PanAmSat holds a replacement expectancy for the 123° W.L. orbital location because the Commission authorized PanAmSat to operate SBS-5, Galaxy 10 and Galaxy 10R at the 123° W.L. location. As demonstrated in the Engineering Statement, Galaxy 18 is technically consistent with existing and future satellites operating in a two-degree environment. In addition, operation of Galaxy 18 will be conducted within the international coordination obligations that derive from the ITU Radio Regulations.¹¹

⁹ 47 C.F.R. § 25.165(a) and (e); *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760, ¶ 167 (2003).

¹⁰ *Columbia Communications Corporation Authorization to Launch and Operate a Geostationary C-band Replacement Satellite in the Fixed-Satellite Service at 37.5° W.L.*, Memorandum Opinion and Order, 16 FCC Rcd 20176, ¶ 7 (2001) (citing *Assignment of Orbital Locations to Space Stations in Domestic Fixed-Satellite Service*, Memorandum Opinion and Order, 3 FCC Rcd 6972, n.31 (1988) and *GE American Communications, Inc.*, Order and Authorization, 10 FCC Rcd 13775, ¶ 6 (Int'l Bur. 1995)).

¹¹ *Amendment of the Commission's Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760 ¶ 257 (2003) (“We do not require replacement satellites to be technically ‘identical’ to the existing satellite. We recognize that next-generation satellites will incorporate satellites with technical advancements made since the previous generation satellite was launched. We do not intend to change this policy, which facilitates state-of-the-art systems. Rather, we will continue to assess only whether operations of the replacement satellite will be consistent with our international coordination obligations pursuant to regulations promulgated by the International Telecommunication Union.”) (internal citations omitted).

In addition, grant of this application will serve the public interest by ensuring continuity of service to U.S. consumers from the 123° W.L. orbital location. PanAmSat stands ready to deploy a replacement satellite to the 123° W.L. orbital location before Galaxy 10R reaches the end of its useful life, and, as noted above, has taken concrete steps toward constructing Galaxy 18. The Commission has stated that granting replacement applications ensures that service will be provided to U.S. consumers as efficiently as possible because the current licensee will be familiar with the service requirements and, given its experience, should be able to deploy a replacement satellite in the shortest possible time.¹² In the case of a satellite reaching the end of its useful life, the Commission has determined that ensuring continuity of service to customers by granting authority to replace the satellite is in the public interest.¹³

IV. CONCLUSION

Based on the foregoing, PanAmSat respectfully requests that the Commission grant this replacement satellite application.

¹² See *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, 18 FCC Rcd 1962, ¶ 83 (2003) (“Repairing or even replacing a malfunctioning satellite, for all its complexity, requires less time than designing and constructing a new system. Even in the worst case where a satellite is destroyed, a licensee can ordinarily replace a lost satellite with a ground spare at the next available launch window, or procure a technically identical satellite in an expedient manner since it would have already completed the complex design process.”).

¹³ *GE American Communications, Inc. and Alascom, Inc. for Authorization to Launch and Operate a C-Band Replacement Satellite*, Memorandum Opinion, Order and Authorization, 15 FCC Rcd 23583, ¶ 18 (Int’l Bur. 2000).

Respectfully submitted,

/s/ Susan H. Crandall

Susan H. Crandall
Asst. General Counsel
Intelsat Corporation

Jennifer D. Hindin
WILEY REIN LLP
1776 K Street, N.W.
Washington, DC 20006

February 22 , 2007

Exhibit A
FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved the foreign ownership in PanAmSat Licensee Corp. See *Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, FCC 06-85 (rel. June 19, 2006) (“*Intelsat-PAS Order*”). There have been no material changes to the foreign ownership since the date of the *Intelsat-PAS Order*.

Exhibit B
FCC Form 312, Response to Question 36: Cancelled Authorizations

PanAmSat Licensee Corp. (“PanAmSat”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat, based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones. *See PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000).* In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by question 36, PanAmSat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on PanAmSat’s basic qualifications, which are well-established and a matter of public record.

Exhibit C
FCC Form 312, Response to Question 40:
Officers, Directors, and Ten Percent or Greater Shareholders

Following are the officers of PanAmSat Licensee Corp.:

James B. Frownfelter, President & COO
Patricia Casey, General Counsel & Secretary
Anita Beier, Controller
Linda Kokal, Treasurer

The address of all PanAmSat Licensee Corp. officers is:

3400 International Drive NW
Washington, DC 20008-3006

PanAmSat Licensee Corp. is wholly owned by PanAmSat International Systems LLC, which in turn is wholly owned by Intelsat Corporation (formerly known as PanAmSat Corporation). Intelsat Corporation holds 59% of its interest in PanAmSat International Systems LLC directly and 41% indirectly. (Specifically, Intelsat Corporation wholly owns 100% of PanAmSat International Holdings LLC, which wholly owns USHI, LLC, which in turn holds a direct, 41% interest in PanAmSat International Systems LLC.) Intelsat Corporation is wholly owned by Intelsat Holding Corporation (formerly known as PanAmSat Holding Corporation). Intelsat Holding Corporation is wholly owned by Intelsat (Poland) Sp. z.o.o., which is in turn wholly owned by Intelsat (Luxembourg) Sarl, which is in turn wholly owned by Intelsat (Gibraltar), Ltd., which is in turn wholly owned by Intelsat (Bermuda), Ltd. Intelsat (Bermuda), Ltd. is wholly owned by Intelsat, Ltd. Intelsat, Ltd., in turn, is wholly owned by Intelsat Holdings, Ltd.

Following are the officers and directors of Intelsat Holdings, Ltd.:

Officers

Joseph Wright, Chairman
David P. McGlade, Chief Executive Officer
Andrew D. Africk, Deputy Chairman
Jeffrey Freimark, Executive Vice President and Chief Financial Officer
Phillip Spector, Executive Vice President, General Counsel and Assistant Secretary
Gloria Dill, Secretary

Directors

Andrew D. Africk
Douglas Grissom
Richard A. Haight
David P. McGlade
James N. Perry, Jr.

Alan Peyrat
 Andrew P. Sillitoe
 Aaron J. Stone
 Nicola Volpi
 Joseph Wright

Shareholders holding 10% or more of the voting stock of Intelsat Holdings, Ltd. are as follows (percentage ownerships indicated are approximate):

Shareholder	Jurisdiction of Incorporation	Address	% of voting ¹⁴ and equity stock
AIF V Euro Holdings, L.P.	Cayman Islands	c/o Walkers SPV Limited Walker House PO Box 908GT George Town, Grand Cayman Cayman Islands	23.9% of voting stock 31.4% of Series A Common Stock
Apax WW Nominees Ltd. ¹⁵	United Kingdom	15 Portland Place London W1B 1PT	22.2% of voting stock 92.8% of Series B Common Stock
MDCP IV Global Investments, L.P.	Cayman Islands	c/o Walkers SPV Limited PO Box 908GT Walker House Mary Street George Town, Grand Cayman Cayman Islands, B.W.I.	23.9% of voting stock 31.4% of Series A Common Stock
Permira Europe III L.P. 2 ¹⁶	Guernsey	PO Box 255 Trafalgar Court Les Banques St. Peter Port, Guernsey CI, GY1 3QL	17.2% of voting stock 22.6% of Series A Common Stock

¹⁴ The percentage of voting stock is calculated by dividing the number of votes represented by the common shares held by the entity by the total number of votes represented by the common shares that are outstanding and have the right to vote.

¹⁵ Registered shareholder for nine entities. Other entities advised by or associated with Apax Partners hold, in the aggregate, an additional 1.7% of voting stock and 7.2% of Series B Common Stock of Intelsat Holdings, Ltd.

¹⁶ Other entities affiliated or otherwise associated with Permira Europe III, L.P. 2 hold, in the aggregate, an additional 6.7% of voting stock and 8.9% of Series A Common Stock of Intelsat Holdings, Ltd.