

November 26, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Extension of Special Temporary Authority to Temporarily
Locate Intelsat 11 at 43.2° W.L. and Operate Its TT&C Frequencies
Call Sign: S2237

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 30-day extension -- through January 1, 2008 -- of the Special Temporary Authority ("STA")¹ originally granted it to stop Intelsat 11 at 43.2° W.L. and temporarily operate only the satellite's TT&C frequencies at that location.² Intelsat 11 currently is licensed to operate at 43.1° W.L.³ and the satellite ultimately will be deployed to that location. However, for the reasons explained in its original STA request, PanAmSat wishes to continue temporarily to keep the satellite at 43.2° W.L., while operating only the satellite's TT&C frequencies.

As PanAmSat previously explained, Intelsat 11 is a replacement satellite for Intelsat 6B, which currently operates at 43.1° W.L. Originally, PanAmSat intended to drift Intelsat 11 to 43.1° W.L. immediately after completion of in-orbit testing and to transfer the traffic currently on Intelsat 6B to Intelsat 11 at this location. Subsequently, Intelsat 6B would be moved to 43.2° W.L. until the satellite is de-orbited.⁴ However, because Intelsat 11 does not yet have the requisite landing rights in one country, the traffic on Intelsat 6B cannot yet be transferred to Intelsat 11. In order to ensure safe station-keeping of both Intelsat 11 and Intelsat 6B, PanAmSat temporarily has located Intelsat 11 at 43.2° W.L., where it operates only the satellite's TT&C frequencies. Immediately upon receipt of the required foreign landing rights, PanAmSat intends to drift Intelsat

¹ PanAmSat has filed this STA request, an FCC Form 159 and a \$790.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00481, File No. SAT-STA-20071018-00143 (Nov. 9, 2007) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00474, File Nos. SAT-MOD-20070207-00027 and SAT-AMD-20070716-00102 (Oct. 5, 2007) (Public Notice).

⁴ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00470, File No. SAT-STA-20070813-00114 (Sept. 14, 2007) (Public Notice).

11 to 43.1° W.L. and transfer Intelsat 6B's traffic to it. To the extent it needs such authorization, PanAmSat asks that this STA request also include the ability to drift Intelsat 11 to 43.1° W.L. at such time as traffic transfer legally can occur.

As noted in its original STA request, PanAmSat also has filed a 180-day STA request to operate the satellite's TT&C frequencies at 43.2° W.L., which remains pending.⁵ PanAmSat fully expects, however, to have the requisite landing rights needed to transfer traffic from Intelsat 6B to Intelsat 11 well before the current expected end-of-life date of Intelsat 6B, which is February 2008.

While Intelsat 11 continues to be located temporarily at 43.2° W.L., and while it subsequently drifts from 43.2° W.L. to 43.1° W.L., only the following TT&C frequencies will be operated on the satellite: command frequencies 13246.5 MHz (horizontal polarization) and 13995.5 MHz (vertical polarization); telemetry frequencies 11448 MHz (horizontal polarization) and 11449 MHz (horizontal polarization).

All TT&C operations of Intelsat 11 at 43.2° W.L. will continue to be in conformance with relevant coordination agreements PanAmSat has reached with other administrations regarding operations at the nominal 43.0° W.L. location. In addition, PanAmSat will continue to operate in accordance with the FCC's rules designed to allow co-frequency, co-coverage operations in a two-degree spaced environment. As a result of these efforts, PanAmSat's continued operation of Intelsat 11's TT&C frequencies at the 43.2° W.L. location poses no risk of harmful interference to adjacent operational satellites.

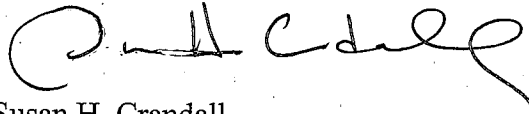
Grant of this STA request will serve the public interest by allowing PanAmSat to ensure the safe station-keeping of Intelsat 11 and Intelsat 6B at the nominal 43.0° W.L. location until services legally can be transferred from the latter to the former. As noted above, PanAmSat expects to be able to move Intelsat 11 to 43.1° W.L. and complete the traffic transfer well in advance of the need to de-orbit Intelsat 6B.

⁵ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00478, File No. SAT-STA-200710-18-00142 (Nov. 2, 2007) (Public Notice).

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For the reasons set forth herein, PanAmSat respectfully requests that the Commission grant this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Andrea Kelly
Karl Kensinger
Jabin Vahora