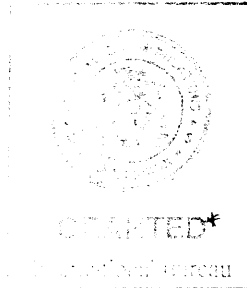


S2469 SAT-STA-20090303-00030 IB2009000561  
Intelsat North America LLC



File # SAT-STA-20090303-00030

Call Sign S2469 Grant Date 03/16/09  
(or other identifier)

From 03/16/09 Term Dates period of  
To: 60 days

Approved by OMB  
3060-0678

Date & Time Filed: Mar 3 2009 5:56:31:823PM  
File Number: SAT-STA-20090303-00030  
Callsign:

\*subject to conditions

Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Policy Branch

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

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

Request for Special Temporary Authority to Operate Galaxy 26 at 50.75 E.L. (Call Sign S2469)

1. Applicant

<b>Name:</b>	Intelsat North America LLC	<b>Phone Number:</b>	202-944-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	202-944-7870
<b>Street:</b>	c/o Intelsat Corporation 3400 International Drive, N.W.	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20008 -3006
<b>Attention:</b>	Susan H Crandall		

**Attachment**  
**IBFS File No. File No. SAT-STA-20090303-00030**  
**Call Sign S2469**  
**March 16, 2009**

The request of Intelsat North America LLC (Intelsat), IBFS File No. SAT-STA-20090303-00030, is GRANTED. Accordingly, Intelsat is authorized, for a period of 60 days commencing on March 16, 2009, to operate the Galaxy 26 space station (Call Sign S2469) to provide Fixed Satellite Services (FSS) in the Ku-band frequencies of 14000-14500 MHz and 11700-12200 MHz at the 50.75° E.L. orbital location. Additionally, Intelsat is authorized to provide on-station Telemetry, Tracking, and Command operations at the 50.75° E.L. orbital location using the following C-band frequencies:

- Telemetry: 4196.5 MHz (vertical polarization/space-to-Earth) or 4199.5 MHz (vertical polarization/space-to-Earth)
- Ranging: 6315.0 MHz (vertical polarization/Earth-to-space) and 4090.0 MHz (horizontal polarization/space-to-Earth)
- Command: Primary: 5926.5 MHz (right-hand circular polarization/Earth-to-space); Back-Up: 6411.0 MHz (right-hand circular polarization/Earth-to-space)

These Ku- and C-band operations are authorized in accordance with the technical specifications set forth in Intelsat's application, the Commission's rules, and the following conditions:

1. All operations shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station.
2. In the event of any harmful interference caused by Galaxy 26's operations at the 50.75° E.L. orbital location, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
3. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's own risk.
4. Intelsat's request for waiver of Section 25.202(g) of the Commission's rules, 47 C.F.R. 25.202(g) is GRANTED as conditioned. Section 25.202(g) requires that "telemetry, tracking and telecommand (TT&C) functions for U.S. domestic satellites shall be conducted at either or both edges of the allocated band(s). Frequencies, polarization, and coding shall be selected to minimize interference into other satellite networks and within their own satellite system." Intelsat seeks a waiver of this rule to operate Galaxy 26's back-up command uplink at 6411.0 MHz, its ranging uplink at 6315.0 MHz, and its ranging downlink at 4090.0 MHz, none of which are at the band edges, for regular on-station TT&C communications. This waiver grant is based upon the following findings:

(a) Due to the health issues with Galaxy 26, Intelsat can only operate the space station's back-up command uplink, ranging uplink, and ranging downlink at the aforementioned frequencies;

(b) Intelsat needs to operate command and ranging with Galaxy 26 in order to insure safe operation of the space station;


(c) Intelsat will coordinate operations of Galaxy 26 with other space stations to avoid interference, and will operate Galaxy 26 on a non-interference basis.

As a condition of granting this waiver, Intelsat shall coordinate the TT&C operations permitted pursuant to condition No. 5 with all potentially-affected operators of other radiocommunication systems. Additionally, Intelsat must accommodate future space station networks that are compliant with Section 25.202(g) of the Commission's rules.

5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application for permanent operations of the Galaxy 26 space station at the 50.75° E.L. orbital location (IBFS File No. SAT-MOD-20090309-00034).

6. Intelsat 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.

7. These actions are issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and are effective 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.

 GRANTED* International Bureau	File # <u>SAT- STA- 20090303- 00030</u>
	Call Sign <u>S2469</u> Grant Date <u>03/16/09</u> (or other identifier)
	Term Dates period of From <u>03/16/09</u> To: <u>60 days</u>
	Approved: <u>Stephen J Duall</u> Stephen J Duall Chief, Policy Branch

\*subject to conditions

<b>2. Contact</b>	
<b>Name:</b> Intelsat North America LLC	<b>Phone Number:</b> 202-944-7848
<b>Company:</b>	<b>Fax Number:</b> 202-944-7870
<b>Street:</b> c/o Intelsat Corporation	<b>E-Mail:</b> susan.crandall@intelsat.com
3400 International Drive, N.W.	
<b>City:</b> Washington	<b>State:</b> DC
<b>Country:</b> USA	<b>Zipcode:</b> 20008 -3006
<b>Attention:</b> Susan H. Crandall	<b>Relationship:</b> Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
<b>3. Reference File Number or Submission ID</b>	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification    CRY – Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input checked="" type="radio"/> Other	
6. Temporary Orbit Location	7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat North America LLC herein requests STA for 60 days beginning 03/17/2009 to operate Galaxy 26 at 50.75 E.L. in the conventional C- and Ku-bands on a non-interference, non-protected basis to satisfy the request of a U.S. Government customer for capacity in the Indian Ocean region.

9. 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

10. Name of Person Signing  
Susan H. Crandall

11. Title of Person Signing  
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 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).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**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.**

March 3, 2009

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



Re: Request for Special Temporary Authority for Galaxy 26  
Call Sign: S2469

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 60 days beginning March 17, 2009 to operate Galaxy 26 at 50.75° E.L. in the conventional C- and Ku-bands on a non-interference, non-protected basis to satisfy a U.S. Government customer's urgent request for capacity in the Indian Ocean region.<sup>2</sup> C-band frequencies will only be used for command, telemetry and ranging operations in the specific frequencies listed below. Intelsat will shortly file an application to modify the satellite's license to enable its operation at 50.75° E.L. on a permanent basis.

On March 17, 2009 Intelsat is scheduled to commence traffic transfer to Galaxy 26 at 50.75° E.L. from Intelsat 706, which currently operates at 50.25° E.L.<sup>3</sup> Intelsat 706 currently is scheduled to begin drifting to 54.85° E.L. on March 21, 2009, subject to receipt of FCC approval.<sup>4</sup>

Grant of this STA request is in the public interest because it will allow Intelsat to satisfy an urgent request by a U.S. Government customer for capacity in the Indian Ocean region. Specifically, the recent failure of a commercial satellite has left the U.S. Government customer without capacity it had reserved to

<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> Intelsat currently is drifting Galaxy 26 to 50.75° E.L. pursuant to STA. See File No. SAT-STA-20090212-00022 (stamp grant issued Feb. 19, 2009 by Stephen J. Duall, with conditions) and File No. SAT-STA-20090220-00028 (stamp grant issued Feb. 20, 2009 by Stephen J. Duall, with conditions). Intelsat expects to have the satellite on station at 50.75° E.L. by March 15, 2009.

<sup>3</sup> Traffic transfer will require a change in frequency plan and re-pointing of earth station antennas.

<sup>4</sup> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00575, File No. SAT-MOD-20081124-00218 (Jan. 23, 2009) (Public Notice).

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March 3, 2009  
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handle traffic that will need to be offloaded from Intelsat 706 by March 20, 2009.

Grant of this STA request will not result in increased risk of harmful interference. At 50.75° E.L., Intelsat will operate Galaxy 26 on a non-interference, non-protected basis. Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Galaxy 26 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 26 at 50.75° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 26 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The C-band frequencies to be used are given in the table below.

Carrier	Frequency
Primary Command	5926.5 MHz (Earth-to-space) (RHCP)
Back-Up Command	6411 MHz (Earth-to-space) (RHCP)
Telemetry	4196.5 MHz (V) or 4199.5 MHz (V)
Ranging <sup>5</sup>	6315 MHz (V) (Earth-to-space), 4090 MHz (H) (space-to-Earth)

To the extent necessary, Intelsat herein seeks a waiver of Section 25.202(g) of the Commission's rules, which requires that telemetry, tracking and

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<sup>5</sup> Due to satellite health issues, Intelsat is conducting ranging in Galaxy 26's communications payload.



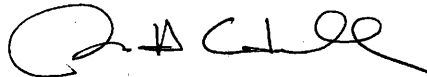
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telecommand frequencies be located at either or both edges of the allocated bands.<sup>6</sup> Under Section 1.3 of the Commission's rules, the Commission has the authority to waive its rules "for good cause shown."<sup>7</sup> Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.<sup>8</sup> In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."<sup>9</sup>

Waiver is justified here to ensure safe operation of Galaxy 26. Access to the above-specified ranging frequencies will serve the public interest by allowing Intelsat to track the satellite. Unfortunately, health issues with the Galaxy 26 satellite prevent the ranging from being located at the edge of the C-band. Moreover, grant of the waiver will not cause harmful interference to adjacent satellites. Intelsat is coordinating all C-band frequencies shown in the table above, including ranging frequencies, with Gazprom Space Systems -- the operator of the Yamal-202 satellite that operates in C-band at 49.0° E.L. Moreover, as noted above, Intelsat will operate Galaxy 26 on a non-interference basis.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Kathryn Medley  
Stephen Duall

<sup>6</sup> 47 C.F.R. 25.202(g).

<sup>7</sup> 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

<sup>8</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>9</sup> *WAIT Radio*, 418 F.2d at 1159.