

December 2, 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 Intelsat 1R  
Call Sign: S2368

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 30 days beginning December 17, 2009 to drift Intelsat 1R from 45.0° W.L. to 50.0° W.L. and operate temporarily at the 50.0° W.L. location. PanAmSat has a pending application to modify Intelsat 1R's license to allow it to relocate the satellite to, and operate it in the C- and Ku-bands at, 50.0° W.L.<sup>2</sup>, where it will temporarily be co-located with Intelsat 705.<sup>3</sup> Initially, in order to ease the transition of customers from Intelsat 705 to Intelsat 1R, Intelsat 1R will operate at 50.0° W.L. in inclined orbit mode, but will return to station-kept mode once Intelsat 705 is relocated.

PanAmSat expects to have Intelsat 1R at 50.0° W.L. within two weeks of beginning the drift. During the drift, PanAmSat will utilize only Intelsat 1R's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

13.995 GHz (H)  
13.995 GHz (V)  
14.4985 GHz ( LHCP)

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<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> See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00647, File Nos. SAT-MOD-20090720-00073; SAT-AMD-20090820-00091; SAT-AMD-20091113-00122 (Nov. 20, 2009) (Public Notice).

<sup>3</sup> Subject to receipt of FCC approval, Intelsat 705 will be relocated between mid-February and early March 2010.

Downlink:

11.696 GHz (V)  
11.696 GHz (H)  
11.696 GHz (LHCP)

11.697 GHz (V)  
11.697 GHz (H)  
11.697 GHz (LHCP)

Grant of this STA request is in the public interest because it will facilitate PanAmSat's provision of continuity of service to customers at 50.0° W.L. Grant of the STA also will serve the public interest by affording the Commission additional time to complete its review of PanAmSat's pending modification application to relocate Intelsat 1R to, and operate at, 50.0° W.L. Because the pending modification application only recently went on Public Notice, it may not be granted by December 17, 2009. PanAmSat understands and accepts that a grant of STA would not prejudice the Commission's determination of PanAmSat's request to operate Intelsat 1R at 50.0° W.L. on a permanent basis, and any drift /operation of the satellite at that location pursuant to STA would be at PanAmSat's risk.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, PanAmSat will operate only TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, PanAmSat will take all reasonable steps to eliminate such interference. At the 50.0° W.L. location, PanAmSat will operate the satellite's communications payload in conformance with its coordination agreements covering the location.

PanAmSat 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. Except for Intelsat 705, Intelsat 1R 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.<sup>4</sup> Further, PanAmSat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an

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<sup>4</sup> Intelsat 1R and Intelsat 705 will be operated in the same east/west station-keeping box until Intelsat 705 is relocated.

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overlapping station-keeping volume with Intelsat 1R at 50.0° W.L. Finally, PanAmSat is not aware of any system with an overlapping station-keeping volume with Intelsat 1R that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. H. Crandall", written in a cursive style.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Bob Nelson  
Kathryn Medley  
Stephen Duall