

January 5, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554



Re: Request for Special Temporary Authority for Galaxy 27
Call Sign: S2159

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 100 days beginning March 1, 2010 to drift Galaxy 27 (call sign S2159), a C- and Ku-band satellite, to 45.10° E.L. Intelsat will not operate the communications payload on Galaxy 27 during its relocation; only the TT&C carriers will be in use during that time. Intelsat plans to have the satellite on-station at 45.10° E.L. in early June 2010, where it will operate nominally co-located with Intelsat 12 at 45.0° E.L.²

Galaxy 27 currently is located at 129.0° W.L.³ Intelsat plans, upon receipt of Commission approval, to move Galaxy 27 to 45.10° E.L., where Intelsat will

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

² Intelsat 12 operates at 45.0° E.L. pursuant to German authorization.

³ See *Assignment of Orbital Locations to Space Stations in the Domestic Fixed-Satellite Service; the Applications of Am Tel. and Telegraph Co.; EchoStar Satellite Corp.; GE Am. Commcn's; Hughes Commcn's Galaxy, Inc.; Loral Space and Commcn's Ltd.; Orion Network Sys.*; Order and Authorization, 11 FCC Rcd 13,788 (Int'l Bur. 1996); *Loral Space & Commcn's, Ltd. Application For Authority to Construct, Launch, and Operate Space Stations in the Domestic Fixed-Satellite Serv.*, Memorandum Opinion and Order, 11 FCC Rcd 20,441 (Int'l Bur. 1996); *Loral Space & Commcn's Ltd. Application for Modification of Authority to Construct, Launch and Operate a Planned Satellite at 129° W.L.*, Order and Authorization, 15 FCC Rcd 6868 (Int'l Bur. 1999). Intelsat acquired the satellite from Loral in 2005. See *Loral Satellite, Inc. (Debtor-in-Possession) and Loral SpaceCom Corporation (Debtor-in-Possession), Assignors, and Intelsat North Am., LLC, Assignee, Applications for Consent to Assignments of Space Station Authorizations and Petition for Declaratory Ruling Under Section 310(b)(4) of the Commcn's Act of 1934, as Amended*, Order and Authorization, 19 FCC Rcd 2404 (Int'l Bur. 2004).

operate the satellite pursuant to German authorization of the space segment.⁴ Germany will be the International Telecommunication Union ("ITU") notifying administration responsible for ensuring that the satellite's operations at the 45.10° E.L. orbital location comply with all relevant coordination agreements. Germany already is responsible for satellite licensing and oversight at this nominal orbital location. Intelsat acknowledges that the Federal Communications Commission and Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen ("BNetzA") in Germany may exchange letters to ensure there is a mutual understanding regarding the operation of the Galaxy 27 satellite at 45.10° E.L.⁵ Upon completion of the maneuvers required to place Galaxy 27 at 45.10° E.L., Intelsat will notify the Commission and surrender its license for the Galaxy 27 satellite.

Grant of this application will serve the public interest by allowing Intelsat to bring more capacity to the nominal 45.0° E.L. orbital location and thereby help satisfy high customer demand for capacity over the Middle East. No customers currently operating on Galaxy 27 will be negatively affected, as they will have been relocated to other satellites prior to Galaxy 27's drift to 45.10° E.L.⁶ Intelsat expects Galaxy 27 to remain at 45.10° E.L. until it is de-orbited and will comply with any post-mission disposal requirements imposed by the German Administration.

Grant of the requested STA, moreover, would not present any significant risk of interference to other users. Intelsat will not operate the communications payload on Galaxy 27 during the relocation to 45.10° E.L. In addition, Intelsat will follow standard industry practices for coordination of TT&C transmissions during the relocation process.

During the drift from 129.0° W.L. to 45.10° E.L., Intelsat will utilize the following frequencies for TT&C:

Telecommand frequencies: 6423.5 (V)

Telemetry frequencies: 4199.5 (H)

⁴ Intelsat will shortly file a transfer of control application to effectuate the re-flagging of Galaxy 27 to Germany.

⁵ Intelsat would be pleased to provide a point of contact within BNetzA if needed to facilitate such exchange of letters.

⁶ PanAmSat Licensee Corp. will file shortly a modification application to relocate Galaxy 12 (call sign S2422) to 129.0° W.L.

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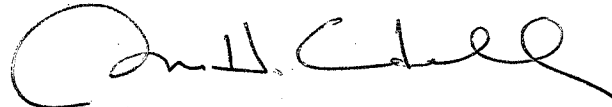
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Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. Galaxy 27 will not be located at the same orbital location as another 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 27 at 45.10° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 27 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request to drift Galaxy 27 to 45.10° E.L., and to operate the TT&C carriers on the satellite in the manner described in this request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Bob Nelson
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