

January 11, 2010

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



Re: Request for Extension of Special Temporary Authority for Intelsat 1R
Call Sign: S2368

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 60-day extension – through March 16, 2010 – of the Special Temporary Authority ("STA")¹ previously granted PanAmSat to drift Intelsat 1R from 45.0° W.L. to 50.0° W.L. and operate temporarily at the 50.0° W.L. location.² 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.³, where it will temporarily be co-located with Intelsat 705.⁴

Intelsat 1R has completed drifting and is located at 50.0° W.L., where traffic is being transitioned to the satellite from Intelsat 705. Initially, in order to ease the transition of customers from Intelsat 705 to Intelsat 1R, Intelsat 1R is operating at 50.0° W.L. in inclined orbit mode, but will return to station-kept mode once Intelsat 705 is relocated.

Grant of this STA extension 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 came off of Public Notice, it may not be granted by January 15, 2010, when the current STA expires. PanAmSat understands and accepts that a grant of STA extension

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-00656, File No. SAT-STA-20091202-00137 (Dec. 18, 2009) (Public Notice).

³ 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).

⁴ Subject to receipt of FCC approval, Intelsat 705 will be relocated between mid-February and early March 2010.

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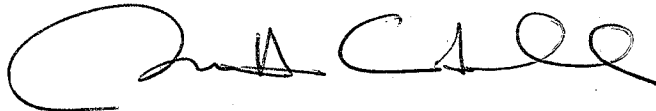
would not prejudice the Commission's determination of PanAmSat's request to operate Intelsat 1R at 50.0° W.L. on a permanent basis, and operation of the satellite at that location pursuant to STA is at PanAmSat's risk.

Grant of this STA extension request will not result in increased risk of harmful interference. PanAmSat will continue operating the satellite's communications payload at 50.0° W.L. in conformance with its sister company Intelsat's 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 collision with large debris or other operational space stations. Except for Intelsat 705, Intelsat 1R is not located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁵ 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 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 grant this STA extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

⁵ Intelsat 1R and Intelsat 705 will be operated in the same east/west station-keeping box until Intelsat 705 is relocated.