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



Re: Request for Extension of Special Temporary Authority for Intelsat 3R Call Sign: PAS-2R

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 30-day extension – through February 26, 2010 – of the Special Temporary Authority ("STA")<sup>1</sup> previously granted PanAmSat to drift Intelsat 3R from 43.0° W.L. to 43.1° W.L., and to operate the satellite temporarily at 43.1° W.L. in the conventional C- and Ku-bands.<sup>2</sup> Intelsat 3R currently is operating at 43.1° W.L. As explained below, PanAmSat intends shortly to file an application for permanent authority to operate the satellite at 43.1° W.L.

PanAmSat relocated Intelsat 3R to 43.1° W.L. under a 180-day because at the time that STA request was filed – January 2009 – the estimated fuel on the satellite resulted in a planned de-orbit date in early-to-mid 2010. Since then, PanAmSat has extended the satellite's estimated End of Maneuver Life date to July 2011 after an annual fuel usage evaluation. Given this new information, PanAmSat will seek permanent authority so as not to have to rely on continued STAs for the remainder of the satellite's life.

Grant of this STA extension request is in the public interest because it will allow PanAmSat to continue operating Intelsat 3R at 43.1° W.L., thereby ensuring continuity of service for the customers on the satellite.

Grant of this STA extension request will not result in increased risk of harmful interference. PanAmSat will continue to operate the Intelsat 3R satellite at 43.1° W.L. in conformance with PanAmSat's coordination agreements related to the nominal 43.0° W.L. location, as well as with the FCC's rules designed to allow co-frequency, co-coverage operations in a two-degree spaced environment.

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

<sup>&</sup>lt;sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00619, File No. SAT-STA-20090129-00012 (July 24, 2009).

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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 Kathyrn Medley Stephen Duall