

March 30, 2010

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



Re: Request for Special Temporary Authority to Drift and
Operate Intelsat 2
Call Sign S2459

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests Special Temporary Authority ("STA")¹ for 90 days beginning June 1, 2010 to drift Intelsat 2 (call sign S2459) from 169.10° E.L. to 157.0° E.L. and to operate the satellite temporarily in the C- and Ku-bands at 157.0° E.L. PanAmSat subsequently will file an STA request and permanent license modification application to redeploy Intelsat 2 to another location after its temporary stay at 157.0° E.L.

Intelsat 2 is currently operating at 169.10° E.L.,² where it is collocated with Intelsat 5 (call sign S2704).³ Following traffic transfer from Intelsat 2 to other Intelsat spacecraft and subject to receipt of FCC approval, Intelsat 2 will be relocated temporarily to 157.0° E.L.

During the drift of Intelsat 2 from 169.10° E.L. to 157.0° E.L., PanAmSat will utilize only the satellite'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:

6424.5 MHz (H)
5925.5 MHz (H)

¹ PanAmSat 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-00574, File No. SAT-MOD-20080811-00153 (Jan. 16, 2009) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00561, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008) (Public Notice).

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Downlink:

4198.5 MHz (H, V)
4199.5 MHz (H, V)

Grant of this STA request is in the public interest because it will allow PanAmSat to conduct temporary operations at 157.0° E.L. before moving the satellite to a different location, thus ensuring maximum fleet flexibility. Moreover, because Intelsat 2 currently is collocated with Intelsat 5 at the nominal 169.0° E.L. location, the redeployment of Intelsat 2 will not result in a loss of service at that location.

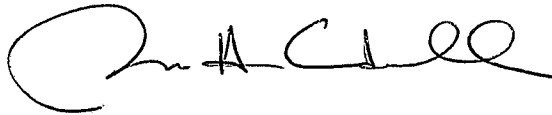
Grant of this STA request will not result in increased risk of harmful interference. As noted above, PanAmSat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, PanAmSat will take all reasonable steps to eliminate such interference. Once on-station at 157.0° E.L., PanAmSat will operate the communications payload in conformance with Intelsat's coordination agreements related to that 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. Intelsat 2 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, 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 2 at 157.0° E.L. Finally, PanAmSat is not aware of any system with an overlapping station-keeping volume with Intelsat 2 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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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 "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall