

March 31, 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
Galaxy 12
Call Sign S2422

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests Special Temporary Authority ("STA")¹ for 60 days beginning April 15, 2010 to drift Galaxy 12 (call sign S2422) from 122.9° W.L. to 129.0° W.L. and begin operating at 129.0° W.L. PanAmSat has a pending application for permanent authority to redeploy Galaxy 12 to 129.0° W.L., where it will operate in the C-band.²

Galaxy 12 is currently licensed to operate at 122.9° W.L.³ Upon receipt of Commission approval, Galaxy 12 will be relocated to 129.0° W.L. where it will replace Galaxy 27 (call sign S2159), which has been authorized to drift to 45.10° E.L.⁴ PanAmSat expects to have Galaxy 12 on-station at 129.0° W.L. within two to three weeks of beginning the drift.

During the drift of Galaxy 12 from 122.9° W.L. to 129.0° W.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:

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; Satellite Space Applications Accepted for Filing*, Report No. SAT-00669, File No. SAT-MOD-20100120-00013 (Mar. 5, 2010) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00553, File No. SAT-MOD-20080630-00133 (Sept. 5, 2008) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00672, File No. SAT-STA-20100105-00004 (Mar. 12, 2010) (Public Notice).

Ms. Marlene H. Dortch
March 31, 2010
Page 2

Uplink:

6424.5 MHz (RHCP), (H)

Downlink:

4198 MHz (LHCP), (V)

4199.875 MHz (LHCP), (V)

Grant of this STA request is in the public interest because it will allow PanAmSat to begin drifting Galaxy 12 and operating the satellite at 129.0° W.L. while the Commission completes its consideration of the pending application for permanent authority. In addition, grant will ensure that the 129.0° W.L. location is occupied very shortly after the departure of Galaxy 27. PanAmSat understands and accepts that a grant of this STA would not prejudice the Commission's determination of PanAmSat's request to operate Galaxy 12 at 129.0° W.L. on a permanent basis, and that operation pursuant to this STA is 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 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 129.0° W.L., PanAmSat will operate the communications payload in conformance with its sister company Intelsat's coordination agreements related to the 129.0° W.L. 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. Galaxy 12 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 Galaxy 12 at 129.0° W.L. Finally, PanAmSat is not aware of any system with an overlapping station-keeping volume with Galaxy 12 at 129.0° W.L. that

Ms. Marlene H. Dortch
March 31, 2010
Page 3

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 "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: Robert Nelson
Kathryn Medley
Stephen Duall