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

Re: PanAmSat Licensee Corp., Request for Special Temporary Authority
for Intelsat 3R, IBFS File No. SAT-STA-20100402-00063
(Call Sign: PAS-2R)

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat"), by counsel, herein responds to the International Bureau's ("Bureau") request for additional information relating to PanAmSat's above-referenced application for Special Temporary Authority ("STA") to drift Intelsat 3R (call sign PAS-2R) from 43.1° W.L. to 81.0° W.L. and to operate the satellite temporarily at 81.0° W.L. in accordance with the Argentine Administration's C- and Ku-band ITU filings.

Responses to specific questions are provided below:

Timing and coordination of the drift to 81.0° W.L.: PanAmSat seeks authority to begin drifting the Intelsat 3R satellite from 43.1° W.L. beginning June 1, 2010. PanAmSat plans to drift Intelsat 3R at a rate of 0.3 degrees per day at approximately 22 km above the geostationary arc. The satellite will arrive at 81.0° W.L. in early October 2010. PanAmSat has scheduled the timing of this drift in order to conserve fuel on the Intelsat 3R satellite. As noted in the pending STA request, PanAmSat will operate only 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. PanAmSat will also conduct a standard two tier physical coordination process as Intelsat 3R passes by other geostationary satellites. PanAmSat will perform the initial physical coordination analysis with two line elements. In the event a potential close approach is detected, PanAmSat will contact the operator of the satellite and the Joint Space Operations Center of the United States for assistance to evaluate the potential close approach with higher quality orbital elements.

Frequencies for operation at 81.0° W.L.: At 81.0° W.L., PanAmSat seeks to operate the Intelsat 3R satellite in the following frequency bands: 3700-4200

Ms. Marlene H. Dortch, Secretary
April 28, 2010
Page 2

MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.7-12.2 GHz (space-to-Earth), and 14.00-14.5 GHz (Earth-to-space).

Operations at 81.0° W.L.: As explained in the pending STA request, while the Intelsat 3R satellite is on-station at 81.0° W.L., PanAmSat will operate it in conformance with Argentina's coordination agreements regarding the location. In addition, PanAmSat will operate in conformance with the FCC's rules designed to allow co-frequency, co-coverage operations in a two-degree spaced environment.

Post Mission Disposal: PanAmSat intends to de-orbit the Intelsat 3R satellite to a perigee of at least 150 kilometers above synchronous altitude.¹ PanAmSat has reserved 27.6 kilograms of fuel for this purpose. PanAmSat has assessed the fuel gauging uncertainty and has provided an adequate margin of fuel reserve to address the assessed uncertainty. The reserved fuel figure will be provided for in the propellant budget. To calculate this figure, the "rocket equation" was used, taking into account the expected mass of the satellite at the end of life and the required delta-velocity to achieve the desired orbit. In addition, PanAmSat will vent all fuel on the Intelsat 3R satellite in compliance with Section 25.283(c) of the rules.²

Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel to PanAmSat Licensee Corp.

cc: Robert Nelson
Stephen Duall
Kathryn Medley

¹ As a satellite launched prior to March 18, 2002, the minimum perigee requirements for decommissioning set forth in Section 25.283(a) of the Commission's rules do not apply to the Intelsat 3R satellite. *See* 47 C.F.R. § 25.283(d).

² 47 C.F.R. § 25.283(c).