

April 8, 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 30 days beginning April 9, 2010 to continue to drift Galaxy 12 (call sign S2422) past 129.0° W.L. to 133.3° W.L., begin operating the communications payload, and then drift the satellite back to 133.0° W.L. while continuing to operate the communications payload.

Galaxy 12 is currently licensed to operate at 122.9° W.L.² PanAmSat has a pending application for permanent authority to redeploy Galaxy 12 to 129.0° W.L.³ PanAmSat is currently drifting the satellite to 129.0° W.L. under STA.⁴ Upon receipt of Commission approval, Galaxy 12 will continue to drift past 129.0° W.L. to 133.3° W.L. Galaxy 12 will arrive at 133.3° W.L. on April 14, 2010 and operate there for approximately one to two weeks. At 133.3° W.L., customer traffic will be transferred from Galaxy 15 (call sign S2387), which is currently licensed to operate at 133.0° W.L.⁵ but is experiencing a technical anomaly. Once customers are transferred, Galaxy 12 will be allowed to naturally drift back to 133.0° W.L. PanAmSat expects to have Galaxy 12 on-station at 133.0° W.L. around mid-May 2010.

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-00553, File No. SAT-MOD-20080630-00133 (Sept. 5, 2008) (Public Notice).

³ 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). PanAmSat will soon file an amendment to this pending application to operate at 133.0° W.L.

⁴ See *Request for Special Temporary Authority to Drift Galaxy 12*, File No. SAT-STA-20100331-00061 (stamp grant April 6, 2010).

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00233, File No. SAT-AMD-20021029-00199 (Aug. 13, 2004) (Public Notice).

During the drift of Galaxy 12 from 129.0° W.L. to 133.3° W.L., PanAmSat will continue to utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. During the drift from 133.3° W.L. to 133.0° W.L., PanAmSat will operate the satellite's C-band communications frequencies as well as the satellite's TT&C frequencies. The operation of Galaxy 12's C-band communications during the drift is being done to ensure continuity of service to C-band customers transferred to the satellite. PanAmSat confirms that there are no satellites between 133.3° W.L. and 133.0° W.L. that operate a C-band communications payload. The specific TT&C frequencies for both the drifts from 129.0° W.L. to 133.3° W.L. and from 133.3° W.L. to 133.0° W.L. are as follows:

Uplink:

6424.5 MHz (RHCP), (H)

Downlink:

4198 MHz (LHCP), (V)

4199.875 MHz (LHCP), (V)⁶

Grant of this STA request is in the public interest because it will allow PanAmSat to continue drifting Galaxy 12 and to operate the satellite at 133.3° W.L. and 133.0° W.L. This will ensure continuity of service to customers despite the technical anomaly on Galaxy 15, as the traffic on Galaxy 15 will be transferred to Galaxy 12. Customers transferred to Galaxy 12 will not experience service degradation or be otherwise harmed by the satellite's drift from 133.3° W.L. to 133.0° W.L.

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 from 129.0° W.L. to 133.3° W.L., and will coordinate its TT&C transmissions with operators of satellites in the drift path. As also noted above, there are no satellites in the drift path from 133.3° W.L. to 133.0° W.L. utilizing C-band communications frequencies, and thus no interference issues are foreseen. Should any interference occur during the drifts, PanAmSat will take all reasonable steps to eliminate such interference. Once on-station at 133.0° W.L., PanAmSat will operate the communications payload in conformance with its sister company Intelsat's coordination agreements related to the 133.0° W.L. location.

⁶ Once Galaxy 12 arrives at 133.3° W.L., the polarization will be reversed for both the uplink and downlink TT&C frequencies. Thus, the uplink frequency will operate in vertical polarization; the downlink frequencies in horizontal polarization.

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. At 133.3° W.L. and at 133.0° W.L., 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 133.3° W.L. or 133.0° W.L. PanAmSat is also not aware of any system with an overlapping station-keeping volume with Galaxy 12 at 133.3° W.L. or 133.0° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch. Finally, PanAmSat will internally coordinate the co-location of Galaxy 15 and Galaxy 12 at the nominal 133.0° W.L. location.

For the reasons set forth herein, PanAmSat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall