

April 9, 2010

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



Re: Request for Special Temporary Authority for Galaxy 15
Call Sign S2387

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat"), pursuant to Section 25.120 of the rules of the Federal Communications Commission ("FCC" or "Commission"),¹ herein requests Special Temporary Authority ("STA")² for 30 days beginning immediately to operate the Galaxy 15 satellite (Call Sign S2387), outside of the +/- 0.05° East/West station-keeping box pursuant to a waiver of Section 25.210(j) of the Commission's rules.³

The Galaxy 15 satellite is currently located at the 133.0° W.L. orbital location.⁴ As PanAmSat previously has informed the International Bureau ("Bureau") staff, on April 5, 2010 the Galaxy 15 satellite experienced an anomaly of unknown origin. Due to this anomaly, the Galaxy 15 satellite is expected to drift outside of its authorized +/- 0.05° East/West station-keeping box.

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account

¹ 47 C.F.R. § 25.120.

² PanAmSat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

³ 47 C.F.R. § 25.210(j).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00233, File No. SAT-AMD-20021029-00199 (Aug. 13, 2004) (Public Notice).

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

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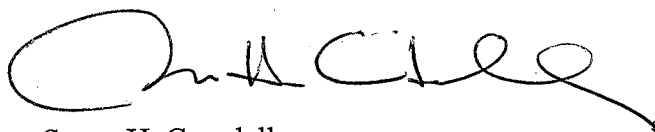
considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists in this case based on hardship. Due to the technical anomaly on the Galaxy 15 satellite, PanAmSat is unable to comply with the requirements of Section 25.210(j) of the Commission's rules. PanAmSat will, however, take all practicable steps to coordinate the safe operation of Galaxy 15.

PanAmSat requests that the STA sought herein commence immediately. The sudden and unexplained anomaly was unforeseen, and is the type of extraordinary event that makes grant of an STA on less than three working days' advance notice appropriate. *See* 47 C.F.R. § 25.120(a).

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.