

April 26, 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 three days -- from May 3, 2010 through May 5, 2010 -- to operate the Galaxy 15 satellite's (Call Sign S2387) C-band communications payload 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

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 has drifted outside of its authorized +/- 0.05° East/West station-keeping box. The Galaxy 15 satellite is currently located at approximately 132.74° W.L. pursuant to STA.⁴ During the time period covered by this STA request, Galaxy 15 will be located at 132.5 +/- 0.1° W.L.

PanAmSat will utilize the transmissions contemplated herein in an attempt to disable the communications payload on the Galaxy 15 satellite. PanAmSat will take this action only if all ongoing efforts to

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-00682, File No. SAT-STA-20100409-00071 (Apr. 16, 2010) (Public Notice).

regain control of Galaxy 15 have not been successful by May 3. PanAmSat's sister company, Intelsat North America LLC, has filed an STA request to utilize an earth station in Clarksburg, Maryland (KA275) to transmit to the satellite for purpose of this disabling effort.⁵ In the course of these transmissions, the Galaxy 15 transponders will operate at saturation, resulting in each of the 10 MHz carriers having at beam peak a downlink EIRP of approximately 41 dBW.

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.⁶ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁷ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁸ 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. Moreover, grant of this STA request will allow PanAmSat to attempt to disable the communications payload on the Galaxy 15 satellite should ongoing attempts to regain control of the spacecraft prove unsuccessful. If this attempt to disable the communications payload is successful, it will greatly reduce the

⁵ See *Intelsat North America LLC Request for Special Temporary Authority, Clarksburg, Maryland Earth Station KA275*, File No. SES-STA-INTR2010-01283 (filed Apr. 23, 2010). As noted therein, in the course of the three days of operations, during one or more periods of up to three hours, the earth station will be transmitting simultaneously to the 24 transponders of the Galaxy 15 satellite.

⁶ 47 C.F.R. §1.3.

⁷ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

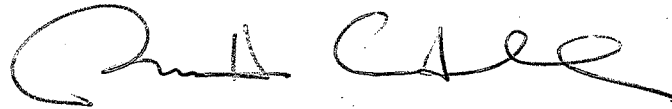
⁸ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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likelihood of Galaxy 15 causing potential interference into the operations of other operators, thereby promoting the public interest.

For the reasons set forth herein, PanAmSat respectfully requests that the Commission 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