

April 30, 2010

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



Re: Request for Extension of 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 an additional 30 days – through June 7, 2010 – of the Special Temporary Authority ("STA")² previously granted PanAmSat to conduct Telemetry, Tracking, and Command ("TT&C") operations on 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 was 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 has drifted outside of its authorized +/- 0.05° East/West station-keeping box.⁵ The satellite currently is located at approximately 132.60° W.L.

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

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). *See Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (rel. Apr. 16, 2010, effective Apr. 9, 2010) (Public Notice).

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

⁵ *See PanAmSat Licensee Corp.*, Request for Special Temporary Authority for Galaxy 15, Call Sign S2387, File No. SAT-STA-20100426-00084 (filed Apr. 26, 2010).

⁶ 47 C.F.R. §1.3.

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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.

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
Karl Kensinger
Kathryn Medley
Stephen Duall

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.