

April 30, 2010

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



Re: Request for Extension of Special Temporary Authority to Drift and Operate Galaxy 12  
Call Sign S2422

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 30-day extension -- through June 7, 2010 -- of the Special Temporary Authority ("STA")<sup>1</sup> previously granted PanAmSat 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.<sup>2</sup>

Galaxy 12 is currently licensed to operate at 122.9° W.L.<sup>3</sup> PanAmSat has a pending application for permanent authority to redeploy Galaxy 12 to 129.0° W.L.<sup>4</sup> PanAmSat initiated the drift of the satellite to 129.0° W.L. under STA.<sup>5</sup> Following the recent technical anomaly on Galaxy 15, however, PanAmSat sought STA to use Galaxy 12 to replace Galaxy 15 at the nominal 133.0° W.L. orbital location.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File Number SAT-STA-20100408-00070 (Apr. 16, 2010).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00553, File No. SAT-MOD-20080630-00133 (Sept. 5, 2008) (Public Notice).

<sup>4</sup> 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.

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00680, File No. SAT-STA-20100331-00061 (Apr. 9, 2010) (Public Notice).

Ms. Marlene H. Dortch

April 30, 2010

Page 2

Galaxy 15 customers have been transferred to Galaxy 12 and Galaxy 12 continues to naturally drift to 133.0° W.L. Galaxy 12 currently is located at approximately 133.17° W.L. and is expected to be on-station at 133.0° W.L. on or about May 6, 2010.

During the remaining drift of Galaxy 12 to 133.0° W.L., PanAmSat will follow industry practices for coordinating TT&C transmissions during the relocation process. During the remaining drift and once the satellite is on location at 133.0° W.L., PanAmSat will continue to operate the satellite's C-band communications frequencies as well as the satellite's TT&C frequencies. The continued operation of the satellite's C-band communications during the drift is being done to ensure continuity of service to C-band customers on 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 the drift to 133.0° W.L. are as follows:

Uplink:

6424.5 MHz (RHCP), (V)

Downlink:

4198 MHz (LHCP), (H)

4199.875 MHz (LHCP), (H)<sup>6</sup>

Grant of this STA extension request is in the public interest because it will allow PanAmSat to continue drifting and operating Galaxy 12, thereby ensuring continuity of service to customers despite the technical anomaly on Galaxy 15. As noted in the original STA request, customers transferred to Galaxy 12 will not experience service degradation or be otherwise harmed by the satellite's drift to 133.0° W.L.

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<sup>6</sup> At 133.3° W.L., the polarization was reversed for both the uplink and downlink TT&C frequencies. Thus, the uplink frequency is now operating in vertical polarization; the downlink frequencies in horizontal polarization.

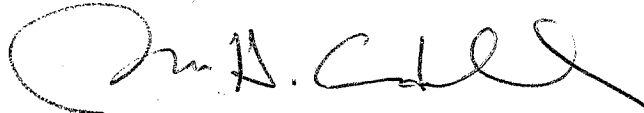
Ms. Marlene H. Dortch  
April 30, 2010  
Page 3

Grant of this STA extension request will not result in increased risk of harmful interference. As noted above, PanAmSat 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 drift, 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.

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 133.0° 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 133.0° W.L. PanAmSat is also not aware of any system with an overlapping station-keeping volume with Galaxy 12 at 133.0° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Robert Nelson  
Kathryn Medley  
Stephen Duall