

June 3, 2010

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



Re: Request for 180-Day Special Temporary Authority to Operate Galaxy
12 at 133.0° W.L.
Call Sign S2422

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a grant of Special Temporary Authority ("STA")¹ for 180 days—from August 8, 2010 through February 3, 2011—to operate Galaxy 12 (call sign S2422) at 133.0° W.L.

Galaxy 12 is currently licensed to operate at 122.9° W.L.², but has been operating at 133.0° W.L. pursuant to two grants of STA following a technical anomaly on Galaxy 15 (call sign S2387).³ As the Commission is aware, PanAmSat sought STA to use Galaxy 12 to replace Galaxy 15 at the nominal 133.0° W.L. orbital location.⁴ PanAmSat has a pending application for permanent authority to redeploy Galaxy 12 to 133.0° W.L.⁵ PanAmSat is

¹ Intelsat 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 (Sept. 5, 2008) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100408-0070 (Apr. 16, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00690, File No. SAT-STA-20100430-00089 (May 14, 2010) (Public Notice).

⁴ See *PanAmSat Licensee Corp. Request for Special Temporary Authority to Drift and Operate Galaxy 12, Call Sign S2422*, File No. SAT-STA-20100408-00070 (filed Apr. 8, 2010) (grant stamped with conditions Apr. 8, 2010); *PanAmSat Licensee Corp. Request for Extension of Special Temporary Authority to Drift and Operate Galaxy 12, Call Sign S2422*, File No. SAT-STA-20100430-00089 (filed Apr. 30, 2010) (grant stamped with conditions May 11, 2010).

⁵ See *PanAmSat Licensee Corp. Modification of Authorization for Galaxy 12 to 129.0° W.L. (S2422)*, File No. SAT-MOD-20100120-00013 (filed Jan. 20, 2010); *PanAmSat Licensee Corp. Amendment to Application to Modify Authorization for Galaxy 12 (S2422) for 133 W.L.*, File No. SAT-AMD-20100514-00102 (filed May 14, 2010).

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simultaneously filing a request for STA to operate Galaxy 12 at 133.0° W.L. for 60 days from June 9, 2010 through August 7, 2010.

From the 133.0° W.L. orbital location, Galaxy 12 will utilize the 5925 – 6425 MHz and 3700 – 4200 MHz frequency bands. The specific TT&C frequencies at 133.0° W.L. are as follows:

Uplink:

6424.5 MHz (RHCP), (V)

Downlink:

4198 MHz (LHCP), (H)

4199.875 MHz (LHCP), (V)⁶

PanAmSat requests that the waiver of Section 25.283(c) of the Commission's rules previously granted to the Galaxy 12 spacecraft continue to apply at the 133.0° W.L. location.⁷ Section 25.283(c) of the Commission's rules requires an applicant to demonstrate that all stored energy will be vented at the spacecraft's end of life.⁸

Grant of this STA is in the public interest because it will allow PanAmSat to ensure continuity of service to customers despite the technical anomaly on Galaxy 15. Galaxy 12 customers have not and will not experience service degradation or be otherwise harmed by the satellite's operation at 133.0° W.L. Grant of the STA also will serve the public interest by affording the Commission time to complete its review of PanAmSat's pending application to relocate Galaxy 12 to, and operate at, 133.0° W.L. PanAmSat understands and accepts that grant of this STA request would not prejudice the Commission's determination of PanAmSat's request to operate Galaxy 12 at 133.0° W.L. on a

⁶ When Galaxy 12 operated 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.

⁷ See *PanAmSat Licensee Corp., Modification of Authorization for Galaxy 12 to 122.9 W.L.*, File No. SAT-MOD-20080630-00133, condition 3 (stamp grant, Sept. 2, 2008).

⁸ 47 C.F.R. § 25.283(c).

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permanent basis, and operation of the satellite at that location pursuant to STA is at PanAmSat's risk.

Grant of this STA request will not result in increased risk of harmful interference. PanAmSat will continue operating the satellite's communications payload at 133.0° W.L. in conformance with its sister company Intelsat's coordination agreements related to the 133.0° W.L. orbital 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. Finally, PanAmSat is 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 grant this STA request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall