

June 28, 2010

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



Re: Request for Further 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 August 2, 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

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-00698, File No. SAT-STA-20100601-00118 (rel. June 11, 2010, effective June 8, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-201000430-00087 (rel. May 7, 2010, effective May 6, 2010) (Public Notice); *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).

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authorized +/- 0.05° East/West station-keeping box.⁵ The satellite currently is located at approximately 128.65° W.L.

Grant of this STA further extension 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 consideration 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 grant this STA further extension request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

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.

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.