

July 7, 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 to Operate Intelsat 3R at 43.1° WL; Call Sign PAS-2R

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests an additional three-week extension – from July 11, 2010 through August 1, 2010 – of the Special Temporary Authority ("STA")¹ previously granted PanAmSat to operate Intelsat 3R (call sign PAS-2R) at 43.1° W.L.² On August 1, 2010, subject to receipt of FCC approval, PanAmSat intends to drift Intelsat 3R to 81.0° W.L.

PanAmSat relocated Intelsat 3R to 43.1° W.L. under a 180-day STA³ because at the time that STA request was filed – January 2009 – the estimated fuel on the satellite resulted in a planned de-orbit date in early-to-mid 2010. Since then, PanAmSat has extended the satellite's estimated End of Maneuver Life to July 2011 after an annual fuel usage evaluation. Given this new information, PanAmSat initially planned to seek permanent authority to operate at 43.1° W.L. In response to customer demand, however, PanAmSat has filed a 180-day STA request to drift Intelsat 3R from 43.1° W.L. to 81.0° W.L., and to operate the satellite temporarily at 81.0° in the conventional C- and Ku-bands.⁴

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 *PanAmSat Licensee Corp. Request for Special Temporary Authority for Intelsat 3R (Call Sign PAS-2R)*, SAT-STA-20100607-00124 (filed Jun. 7, 2010); See *Policy Branch Information; Actions Taken*, Report No. SAT-00694, File No. SAT-STA-20100520-00105 (May 28, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00677, File No. SAT-STA-20100218-00030 and File No. SAT-STA-20100323-00055 (Apr. 2, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00663, File No. SAT-STA-20100122-00016 (Jan. 29, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00619, File No. SAT-STA-20090129-00012 (July 24, 2009) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00619, File No. SAT-STA-20090129-00012 (July 24, 2009) (Public Notice).

⁴ See *PanAmSat Licensee Corp. Request for Special Temporary Authority for Intelsat 3R (Call Sign PAS-2R)*, SAT-STA-20100402-00063 (filed Apr. 2,

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Grant of this STA further extension request is in the public interest because it will allow PanAmSat to continue operating Intelsat 3R at 43.1° W.L. pending its redeployment to 81.0° W.L. This will provide PanAmSat additional time to formulate a redeployment drift plan that best meets all of its customer needs and provide additional time for processing the pending request for STA to relocate the satellite to 81.0° W.L.

Grant of this STA further extension request will not result in increased risk of harmful interference. PanAmSat will continue to operate the Intelsat 3R satellite at 43.1° W.L. in conformance PanAmSat's coordination agreements related to the nominal 43.0° W.L. orbital location, as well as with the FCC's rules designed to allow co-frequency, co-coverage operations in a two-degree spaced environment.

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

Sincerely,

/s/ Jennifer D. Hindin

Wiley Rein LLP
Counsel to Intelsat

On behalf of:
Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall

2010); *Policy Branch Information; Satellite Applications Accepted for Filing*, Report No. SAT-00686, File No. SAT-STA-20100402-00063 (Apr. 30, 2010) (Public Notice).