

July 9, 2010

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



Re: Request for Special Temporary Authority for Galaxy 14, Call Sign S2385

Dear Ms. Dortch:

PanAmSat Licensee Corp. (“PanAmSat”), pursuant to Section 25.210 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ herein requests Special Temporary Authority (“STA”)² for 30 days – from July 23, 2010 through August 21, 2010 – to operate the Galaxy 14 satellite’s (call sign S2385) C-band communications payload (3700-4200 MHz and 5925-6425 MHz) 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 Galaxy 14 is currently authorized to operate from the 125.0° W.L. orbital location.⁴

As PanAmSat previously has informed the International Bureau (“Bureau”), on April 5, 2010, the Galaxy 15 satellite suffered an anomaly of unknown origin. Galaxy 15 has since been drifting eastward toward the 125.0° W.L. orbital location, where Galaxy 14 operates. Galaxy 15 is expected to be within 0.05 degrees of 125.0° W.L. between July 29, 2010 and July 30, 2010. As Galaxy 15 operates on the same C-band frequencies as Galaxy 14, the potential for harmful interference into Galaxy 14 operations is significant as Galaxy 15 approaches. Galaxy 14 may also need to maneuver to the East and the West in order to avoid an in-orbit collision with Galaxy 15.

PanAmSat has developed a plan to move Galaxy 14 to the east by 0.01° outside of its normal station-keeping volume, i.e. to 124.94° W.L. Subsequently, the spacecraft would be moved in a westerly direction to 0.35° outside of its

¹ 47 C.F.R. § 25.210.

² Intelsat has filed this STA request, an FCC Form 159 and a filing fee electronically via the International Bureau’s Filing System.

³ 47 C.F.R. § 25.210(j).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-0030, File No. SAT-MOD-20051206-00261 (Jan. 27, 2006) (Public Notice).

normal station-keeping volume, i.e. to 125.4° W.L. These maneuvers will ensure that a minimum angular separation of 0.2° and a minimum distance separation distance of 140 kilometers will be maintained between Galaxy 14 and Galaxy 15. After Galaxy 15 has drifted sufficiently away from the 125° W.L. orbital location, Galaxy 14 will be returned to its nominal orbital location.

The closest satellites to Galaxy 14 are Galaxy 13 at 127.0° W.L., AMC-21 at 124.9° W.L. and Galaxy 18 at 123.0° W.L. SES Satellites (Gibraltar) Ltd. is the operator of AMC-21. The Galaxy 13 and Galaxy 18 satellites are operated by PanAmSat. The proposed relocation of Galaxy 14, as described above, would not overlap the station-keeping volumes of Galaxy 13 and Galaxy 18. However, it would slightly encroach into the station-keeping volume of AMC-21. Although the risk of collision between Galaxy 14 and AMC-21 is small, PanAmSat shall coordinate the planned orbital maneuvers for Galaxy 14 with the operator of AMC-21.

Grant of this STA request is in the public interest. The Commission may grant waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ 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.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Grant of the requested authority and waiver will serve the public interest by enabling PanAmSat to take these steps, as necessary, to minimize service disruptions for customers on the Galaxy 14 satellite resulting from interference caused by the Galaxy 15 satellite. It will also enable PanAmSat to perform any maneuvers needed to avoid in-orbit collision with the Galaxy 15 satellite. Grant of the requested authority will not adversely affect other authorized operations. The closest C-band spacecraft to the west of Galaxy 14 is Galaxy

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular* 897 F.2d at 1166.

Ms. Marlene H. Dortch

July 9, 2010

Page 3

13 at 127.0° W.L.⁸ and to the east is Galaxy 18 at 123.0° W.L.⁹ PanAmSat does not expect that its proposed operations outside of its assigned station-keeping box will cause harmful interference to adjacent satellites and will coordinate internally the proposed relocation and operation of Galaxy 14.

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

Sincerely,

/s/ Jennifer D. Hindin

Wiley Rein LLP
Counsel to PanAmSat

On behalf of:

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Kathryn Medley
Stephen Duall

⁸ See *PanAmSat Licensee Corp. Amendment to Application for Authority to Launch and Operate a Replacement Fixed-Satellite Service Space Station*, File No. SAT-LOA-19991207-00118 (filed Feb. 28, 2003; grant Sept. 30, 2003).

⁹ See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Replacement Satellite at 123° W.L.*, File No. SAT-RPL-20070222-00035 (filed Feb. 22, 2007; grant Oct. 18, 2007).