

July 30, 2010

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



Re: Request for 30-Day 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 30-day extension – from August 1, 2010 through August 30, 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

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 *Policy Branch Information; Actions Taken*, Report No. 00709, File No. SAT-STA-20100707-00155, File No. SAT-STA-20100607-00124 (July 23, 2010) (Public Notice); *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, 2010); *Policy Branch Information; Satellite Applications Accepted for Filing*,

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From the 43.1° W.L. orbital location, Intelsat 3R will utilize the 3700 – 4200 MHz, 5925 – 6425 MHz, 11.7 – 12.2 GHz, 12.5 – 12.75 GHz, and 14.00 – to 14.5 GHz frequency bands. The specific TT&C frequencies at 43.1° W.L. are as follows:

Uplink:

59.29.5 Horizontal and
64.24 Horizontal

Downlink:

4198.5 Horizontal and Vertical
4199.0 Horizontal and Vertical

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 additional time for consideration of the pending redeployment request. Although, PanAmSat is requesting STA to operate Intelsat 3R at its current orbital location for 30 days, PanAmSat intends to relocate Intelsat 3R to 81.0° W.L. as soon as possible following receipt of FCC approval.

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/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson, Kathryn Medley, Stephen Duall

Report No. SAT-00686, File No. SAT-STA-20100402-00063 (Apr. 30, 2010)
(Public Notice).