

August 10, 2010

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



Re: Request for Special Temporary Authority to Drift and Operate  
Intelsat 2, Call Sign S2459

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests Special Temporary Authority ("STA")<sup>1</sup> for 30 days -- from September 21, 2010 through October 20, 2010 -- to drift Intelsat 2 (call sign S2459) from 157.0° E.L. to 174.0° E.L. and to operate the satellite temporarily in the C- and Ku-bands at 174.0° E.L.

Intelsat 2 currently is operating temporarily at 157.0° E.L.<sup>2</sup> Subject to receipt of FCC approval, Intelsat 2 will be relocated to 174.0° E.L. -- with the drift starting September 21, 2010 and the satellite on-station on November 25, 2010. PanAmSat will operate Intelsat 2 at 174.0° E.L. until its de-orbit, which currently is scheduled for January 2011.<sup>3</sup>

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<sup>1</sup> PanAmSat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00704, File No. SAT-STA-20100330-00059 (Public Notice) (authorizing drift of Intelsat 2 to 157° E.L., while deferring request to operate the communications payload at that location); File No. SAT-STA-20100330-00059, Stamp Grant, S. Duall, Chief Policy Branch, Aug. 6, 2010 (also authorizing operation of Intelsat 2 communications payload at 157° E.L.).

<sup>3</sup> PanAmSat will file a request for special temporary authority to conduct end-of-life disposal maneuvers prior to de-orbiting the Intelsat 2 satellite. The FCC has already approved a post-mission disposal plan for the Intelsat 2 satellite that reserves 25.6 kg of fuel for an intended de-orbit altitude of 150 km. See *Modification To Relocate Intelsat 2 to 169.10° E.L. (S2459)*, File No. SAT-MOD-20080811-00153, Stamp Grant, S. Duall, Chief, Policy Branch, Jan. 14, 2009. The FCC also has extended the license term for the Intelsat 2 satellite to December 1, 2011. See *Modification To Extend the License Term of Intelsat 2*, File Nos. SAT-MOD-20090204-00015 and SAT-AMD-20090526-00057, Stamp Grant, S. Duall, Chief, Policy Branch, July 16, 2009 (extending Intelsat 2 license term to Dec. 1, 2011).

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During the drift of Intelsat 2 from 157.0° E.L. to 174.0° E.L., PanAmSat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6424.5 MHz (H)  
5925.5 MHz (H)

Downlink:

4198.5 MHz (H, V)  
4199.5 MHz (H, V)

The communications payload frequencies are as follows:

Uplink:

5925-6425 MHz  
14000-14500 MHz

Downlink:

3700-4200 MHz  
12250-12750 MHz<sup>4</sup>

Grant of this STA request is in the public interest because it will allow PanAmSat to conduct temporary operations at 174.0° E.L. before de-orbiting the satellite, thus ensuring maximum fleet flexibility. The proposed operation of Intelsat 2 at 174.0° E.L. also serves the public interest because it will preserve the United States' filing priority at the International Telecommunication Union ("ITU) for this orbital location.<sup>5</sup>

Grant of this STA request will not result in increased risk of harmful interference. As noted above, PanAmSat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C

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<sup>4</sup> PanAmSat will operate the 12250-12750 MHz frequencies on Intelsat 2 only over Region 2.

<sup>5</sup> The United States acquired the ITU satellite network filing for the 174.0° E.L. orbital location at the time of Intelsat's privatization.

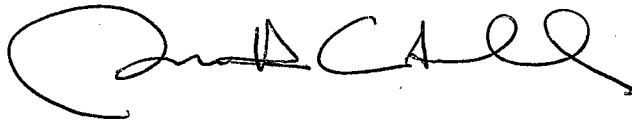
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transmissions with operators of satellites in the drift path. Should any interference occur during the drift, PanAmSat will take all reasonable steps to eliminate such interference. Once on-station at 174.0° E.L., PanAmSat will operate the communications payload in conformance with Intelsat's coordination agreements related to that 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. Intelsat 2 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 Intelsat 2 at 174.0° E.L. Finally, PanAmSat is not aware of any system with an overlapping station-keeping volume with Intelsat 2 at 174.0° E.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 expeditiously grant this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

cc: Karl Kensinger  
Kathryn Medley  
Stephen Duall