

August 30, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 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 25.210 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ herein requests an additional 30 days, from September 6, 2010 through October 5, 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

As PanAmSat previously has informed the International Bureau (“Bureau”) staff, on April 5, 2010, the Galaxy 15 satellite suffered an anomaly of unknown origin. Due to this anomaly, the satellite has drifted outside of its authorized +/- 0.05° East/West station-keeping box pursuant to STA.⁴ During

¹ 47 C.F.R. § 25.210.

² PanAmSat 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). *See Policy Branch Information; Actions Taken*, Report No. SAT-00715, File No. SAT-STA-20100803-00172 (rel. Aug. 13, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00706, File No. SAT-STA-20100628-00149 (rel. July 9, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (rel. June 11, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100430-00087 (rel. May 7, 2010); *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (rel. Apr. 16, 2010) (Public Notice).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00706, File No. SAT-STA-20100628-00149 (rel. July 9, 2010) (Public

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the time period covered by this STA request, Galaxy 15 will be located between 236.0° E.L. and 245.6° E.L.

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.

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, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall

Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (rel. June 11, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100430-00087 (rel. May 7, 2010); *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (rel. Apr. 16, 2010) (Public Notice).

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.

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