

October 29, 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 November 4, 2010 through December 3, 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

¹ 47 C.F.R. § 25.210.

² PanAmSat has filed this STA request, an FCC Form 159 and an \$830.00 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-00727, File No. SAT-STA-20100929-00203 (Oct. 8, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00720, File No. SAT-STA-20100830-00185 (Sep. 10, 2010) (Public Notices); *Policy Branch Information; Actions Taken*, Report No. SAT-00715, File No. SAT-STA-20100803-00172 (Aug. 13, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00706, File No. SAT-STA-20100628-00149 (Jul. 9, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (Jun. 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 (Apr. 16, 2010) (Public Notice).

authorized +/- 0.05° East/West station-keeping box pursuant to STA.⁴ During the time period covered by this STA request, Galaxy 15 will be located between approximately 108.825° W.L. and 103.328° W.L.

Grant of this STA further extension 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, continue to take all practicable steps to coordinate the safe operation of Galaxy 15.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00727, File No. SAT-STA-20100929-00203 (Oct. 8, 2010); *Actions Taken*, Report No. SAT-00720, File No. SAT-STA-20100830-00185 (Sep. 10, 2010) (Public Notices); See *Policy Branch Information; Actions Taken*, Report No. SAT-00715, File No. SAT-STA-20100803-00172 (Aug. 13, 2010) (Public Notice); See *Policy Branch Information; Actions Taken*, Report No. SAT-00706, File No. SAT-STA-20100628-00149 (Jul 9, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (Jun. 11, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100430-00087 (May 7, 2010); *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (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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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this STA further extension request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with the first name being the most prominent.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall