

November 15, 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 to Drift
and Operate Intelsat 2
Call Sign S2459

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 30-day extension – through December 18, 2010 – of the Special Temporary Authority ("STA")¹ previously granted PanAmSat 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.² PanAmSat agrees to accept the same conditions as imposed on the prior STA grant.³

Intelsat 2 currently is drifting toward 174.0° E.L. and is expected to be 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 2011.⁴

During the drift of Intelsat 2 from 157.0° E.L. to 174.0° E.L., PanAmSat will continue to utilize only the satellite's TT&C frequencies and will follow

¹ PanAmSat 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. SAT-00730, File No. SAT-STA-20101012-00215 (Oct. 22, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00723, File No. SAT-STA-20100810-00176 (Sep. 24, 2010) (Public Notice).

³ See *id.*

⁴ 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 *PanAmSat Licensee Corp., Application to Modify Authorization to Relocate Intelsat 2 to 169.10° E.L. (S2459)*, File No. SAT-MOD-20080811-00153 (stamp granted with conditions Jan. 14, 2009). The FCC also has extended the license term for the Intelsat 2 satellite to December 1, 2011. See *PanAmSat Licensee Corp., Application for Modification To Extend the License Term of Intelsat 2*, File Nos. SAT-MOD-20090204-00015 and SAT-AMD-20090526-00057 (stamp granted with conditions July 16, 2009).

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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 MHz⁵

Grant of this STA further extension request is in the public interest because it will continue to 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.⁶

Grant of this STA further extension request will not result in increased risk of harmful interference. As noted above, PanAmSat will operate only the above

⁵ PanAmSat will operate the 12250-12750 MHz frequencies on Intelsat 2 only over Region 2.

⁶ The United States acquired the ITU satellite network filing for the 174.0° E.L. orbital location at the time of Intelsat's privatization.

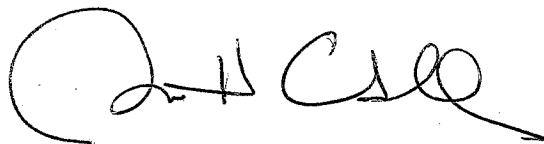
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listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, PanAmSat will take all reasonable steps to eliminate such interference. 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 further extension request.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathyrn Medley
Stephen Duall