

December 28, 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 January 3, 2011 through February 1, 2011, 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

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-00741, File No. SAT-STA-20101129-00248 (Dec. 3, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00735, File No. SAT-STA-20101029-00227 (Nov. 5, 2010) (Public Notice); *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).

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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 drifted outside of its authorized +/- 0.05° East/West station-keeping box pursuant to STA.⁴

On December 23, 2010, Galaxy 15 lost Earth lock, all power drained from its battery, and the command unit reset, as it was designed to do.⁵ Shortly thereafter, Galaxy 15 began accepting commands and PanAmSat began receiving telemetry from the satellite. The satellite initially was placed in Sun acquisition mode for diagnostic testing. On December 27, 2010, after the spacecraft’s batteries were fully charged and the satellite was thermally balanced, Galaxy 15 was placed in Earth acquisition mode.

Currently, Galaxy 15 is located at approximately 98.8° W.L. PanAmSat is drifting the satellite to 93.0° W.L. where it will be collocated with Galaxy 25, which is operated at 93.10° W.L. by PanAmSat’s sister company, Intelsat North America LLC. Subject to receipt of separate FCC approval, PanAmSat plans to perform in-orbit testing at 93.0° W.L. to determine the functionality of every aspect of Galaxy 15.⁶ PanAmSat expects to have Galaxy 15 on-station

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00735, File No. SAT-STA-20101029-00227 (Nov. 5, 2010) (Public Notice); *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 The satellite’s communications payload had earlier shut off as a result of power loss.

⁶ PanAmSat expects shortly to file an STA request to test the satellite’s communications payload at 93.0° W.L. All testing will be done in such a way so as to protect existing C-band services on Galaxy 25. Assuming a successful

at 93.0° W.L. on or about January 29, 2011.⁷ During the duration of this STA extension period, PanAmSat will utilize only the satellite's TT&C frequencies⁸; the communications frequencies will not be utilized unless separately authorized.

Grant of this STA further extension request is in the public interest. The Commission may grant waiver for good cause shown.⁹ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.¹⁰ 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.¹¹ 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 was unable to comply with the requirements of Section 25.210(j) of the Commission's rules. Now that PanAmSat is able to command the satellite, it will continue to take all practicable steps to coordinate the safe drift of Galaxy 15 to 93.0° W.L. and ensure its safe station-keeping at that location, including coordinating with all operators in the drift path. As noted above, PanAmSat will not utilize the satellite's communications frequencies until it has received separate authorization to do so.

outcome to the testing, PanAmSat expects subsequently to move Galaxy 15 to either 133° W.L. or 129° W.L.

⁷ Once the satellite is on-station, PanAmSat will perform station-keeping maneuvers to reduce its inclination and place it in the required +/- .05 station-keeping box.

⁸ The specific TT&C frequencies are: 6424.5 MHz (V) and 6424.5 MHz (RHC) (uplink) and 4198.0 MHz (H), 4199.875 (H), 4198.0 (LHC), and 4199.875 (LHC) (downlink).

⁹ 47 C.F.R. § 1.3.

¹⁰ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

¹¹ *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,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall