

January 10, 2011

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



Re: Request for 180-Day Extension of Special Temporary Authority  
for Intelsat 3R and Extension of License Term  
Call Sign: PAS-2R

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 180-day extension—from March 1, 2011 through August 27, 2011—of the Special Temporary Authority ("STA")<sup>1</sup> previously granted PanAmSat to operate Intelsat 3R (call sign PAS-2R) temporarily at 81.0° W.L. in accordance with the Argentine Administration's ITU filings in the C- and Ku-bands.<sup>2</sup> In addition, PanAmSat seeks to extend the license term of the Intelsat 3R satellite through July 31, 2011. Given that the existing STA to operate Intelsat 3R at 81° W.L. expires on January 30, 2011, PanAmSat separately will file a request for 30-day STA—from January 31, 2011 through February 28, 2011—to avoid any lapse in authority pending public notice of this 180-day STA request.<sup>3</sup>

In 2009, the estimated fuel on the Intelsat 3R satellite resulted in a planned de-orbit date in early-to-mid 2010. PanAmSat has since extended the satellite's estimated End of Maneuver Life through July 2011 after an annual fuel usage evaluation.

Grant of this STA extension request is in the public interest because it will allow PanAmSat to continue to meet customer demand at 81.0°

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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-00713, File No. SAT-STA-20100402-00063 (Aug. 6, 2010); See *PanAmSat Licensee Corp., Request for Special Temporary Authority for Intelsat 3R (Call Sign PAS-2R)*, File No. SAT-STA-20100402-00063 (filed Apr. 2, 2010) (stamp grant with conditions Aug. 3, 2010).

<sup>3</sup> See 47 C.F.R. § 25.120 (establishing grants of special temporary authority for 30 days without public notice).

W.L. Continued operation of Intelsat 3R will also allow PanAmSat to maximize the utility of its in-orbit assets.

Grant of this STA extension request will not result in increased risk of harmful interference. PanAmSat will continue operating the satellite's communications payload at 81.0° W.L. in accordance with Argentina's C- and Ku-band ITU filings. PanAmSat incorporates by reference its previously-filed letters demonstrating its authority to operate Intelsat 3R at 81.0° W.L.<sup>4</sup>

PanAmSat also seeks authority to extend the license term of the Intelsat 3R satellite through July 31, 2011. The Intelsat 3R satellite was launched and placed into service on February 1, 1996.<sup>5</sup> Pursuant to the satellite's fifteen year license term, this authorization will expire on February 1, 2011.<sup>6</sup>

Grant of this application is consistent with the Commission's end-of-life rules. PanAmSat anticipates that Intelsat 3R has sufficient fuel to continue providing service to customers through July 31, 2011. At that time, based on standard industry fuel gauging methods, PanAmSat anticipates having adequate fuel to de-orbit the Intelsat 3R satellite to a perigee altitude of 150 km above the geostationary arc. Finally, the requested license extension of approximately six months for the Intelsat 3R satellite is consistent with precedent for satellites that are performing well.<sup>7</sup>

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<sup>4</sup> See *PanAmSat Licensee Corp., Request for Special Temporary Authority for Intelsat 3R (Call Sign PAS-2R)*, File No. SAT-STA-20100402-00063 at Attachments 1 and 2 (filed Apr. 2, 2010).

<sup>5</sup> See Letter from Joseph A. Godles to Marlene H. Dortch, PanAmSat Licensee Corp. Annual Status Report at 5 (filed June 30, 2005).

<sup>6</sup> See 47 C.F.R. § 25.121(a).

<sup>7</sup> See, e.g. *SES Americon, Inc., Application for Modification of the Satcom C-3 License to Extend the License Term*, File No. SAT-MOD-20080318-00073 (stamp grant June 11, 2008) (granting three year extension of license term); *PanAmSat Licensee Corp., SBS-6 Modification to Extend License Term*, File No. SAT-MOD-20051020-00204 (stamp grant Aug. 17, 2006) (granting five year extension of license term).

Ms. Marlene H. Dortch  
January 10, 2011  
Page 3

For the reasons set forth herein, PanAmSat respectfully requests that the Commission grant this STA extension request and extend the license period through July 31, 2011.

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: Robert Nelson  
Karl Kensinger  
Kathryn Medley  
Stephen Duall