

January 26, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Special Temporary Authority for Galaxy 15, Call Sign S2387

Dear Ms. Dortch:

Intelsat License LLC¹ (“Intelsat”) herein requests Special Temporary Authority (“STA”)² for seven days, from January 31, 2011 through February 6, 2011, to operate the communications payload on Galaxy 15 at 93.0° W.L. in the event that Intelsat decides to conduct further testing of the satellite.

As the Commission is aware, 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.³

¹ The licenses previously held by PanAmSat Licensee Corp. recently have been assigned to Intelsat License LLC. See Letter from Jennifer Hindin to Marlene H. Dortch, Notification of Consummation of *Pro Forma* Assignment and Transfer of Control and Name Change, File Nos. SES-ASG-20101203-01501, SES-ASG-20101206-01502, SES-T/C-20101203-01503, SES-ASG-20101203-01504, SES-ASG-20101206-01512, SAT-ASG-20101203-00251, SAT-ASG-20101203-00252, SAT-T/C-20101203-00253, SAT-T/C-20101203-00254, and 0004520968 (filed Jan. 18, 2011).

² Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau’s Filing System.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00750, File No. SAT-STA-20101228-00268 (Jan. 14, 2011) (Public Notice); *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); *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); *Policy Branch Information; Actions Taken*, Report No. SAT-00706,

Ms. Marlene H. Dortch

January 26, 2011

Page 2

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.⁴ Shortly thereafter, Galaxy 15 began accepting commands and Intelsat 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 93.0° W.L. where it is collocated with Intelsat's Galaxy 25, which is operated at 93.10° W.L. Intelsat has been conducting tests to determine the functionality of every aspect of the satellite.⁵ Intelsat herein seeks further authority in the event that it or its customers wish to conduct additional testing while the satellite is located at 93.0° W.L.

The specific communications frequencies that will be utilized at 93.0° W.L. are as follows:

3700-4200 MHz (space-to-Earth)

5952-6425 MHz (Earth-to-space)

To the extent Intelsat conducts further tests of Galaxy 15 at 93.0° W.L., it will coordinate the testing with all operators of satellites operating co-frequency up to six degrees away from 93.0° W.L. Specifically, Intelsat will coordinate the proposed testing with StarOne, which operates Brazilsat B2 at 92.0° W.L.; Inmarsat, which operates Inmarsat 4F3 at 98.1° W.L.; and SES AMERICOM, Inc., which operates AMC-3 at 87.0° W.L. In addition, Intelsat will internally coordinate the proposed testing with the following of its satellites: Galaxy 25

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).

⁴ The satellite's communications payload had earlier shut off as a result of power loss.

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-00751, File No. SAT-STA-20110107-00007 (Jan. 21, 2011) (Public Notice).

Ms. Marlene H. Dortch

January 26, 2011

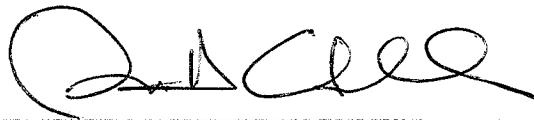
Page 3

(call sign S2154) at 93.10° W.L., Galaxy 3C (call sign S2381) at 95.05° W.L., Galaxy 19 (call sign S2647) at 97.0° W.L., Galaxy 16 at (call sign S2687) at 99.0° W.L., Galaxy 17 (call sign S2715) at 91.0° W.L., and Galaxy 28 (call sign S2160) at 89.0° W.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Grant of this STA request will allow Intelsat to further assess the health of Galaxy 15 following the loss and subsequent recovery of ability to command the satellite. Assuming a successful outcome to the testing, this will in turn help Intelsat return the satellite to commercial operation at either 129° W.L or 133° W.L., thereby serving the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this STA request.

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