

January 27, 2011

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:

Intelsat License LLC (“Intelsat”)¹, pursuant to Section 25.210 of the rules of the Federal Communications Commission (“FCC” or “Commission”),² herein requests an additional 30 days, from February 2, 2011 through March 3, 2011, of the Special Temporary Authority (“STA”)³ 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.⁴

¹ The licenses previously held by PanAmSat Licensee Corp. (“PanAmSat”) 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 47 C.F.R. § 25.210.

³ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau’s Filing System.

⁴ 47 C.F.R. § 25.210(j). 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); *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*,

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 $\pm 0.05^\circ$ East/West station-keeping box pursuant to STA.⁵

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.⁶ 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 is in-orbit testing Galaxy 15 at 93.0° W.L. to determine the functionality of every aspect of the satellite.⁷ During the duration of this requested STA extension period, Intelsat will utilize only the satellite's TT&C frequencies⁸ unless operation of the communications frequencies is separately authorized.

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).

⁵ See *supra* n.4.

⁶ The satellite's communications payload had earlier shut off as a result of power loss.

⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00751, File No. SAT-STA-20110107-00007 (Jan. 21, 2011) (Public Notice).

⁸ The specific TT&C frequencies are: 6420.5 MHz (V) and 6424.5 MHz (RHC) (uplink) and 4198.0 MHz (H), 4199.875 (H), 4198.0 (LHC), and 4199.875 (LHC) (downlink).

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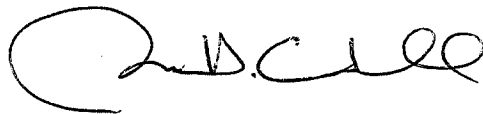
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Grant of this STA further extension request is in the public interest. The Commission may grant waiver for good cause shown.⁹ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.¹⁰ 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, Intelsat was unable to comply with the requirements of Section 25.210(j) of the Commission's rules. Now that Intelsat is able to command Galaxy 15, it will ensure the satellite's safe station-keeping at the 93.0° W.L. location pending completion of in-orbit testing and a determination of the satellite's future role in the Intelsat fleet.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

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.