

February 9, 2011

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



Re: Request for Special Temporary Authority to Drift and Operate 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 Special Temporary Authority (“STA”)³ for 30 days, from February 14, 2011 through March 15, 2011, 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 rules⁴ as the satellite drifts west from its current location of 93.0° W.L. and to operate the satellite’s communications payload at 133.1° W.L.

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.⁵

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 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).

⁵ Intelsat has been operating Galaxy 15 outside its station-keeping box since April of last year. See *Policy Branch Information; Actions Taken*, Report No.

On December 23, 2010, Galaxy 15 lost Earth lock, all power drained from its batteries, 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.

Subsequently, Intelsat drifted the satellite to 93.0° W.L. where it currently is collocated with Intelsat's Galaxy 25 satellite, which operates at 93.10° W.L. Intelsat performed in-orbit testing of Galaxy 15 at 93.0° W.L. and has determined that the satellite is operating nominally. Intelsat herein seeks authority to drift Galaxy 15, commencing February 14, 2011, to 133.1° W.L., where the satellite will operate – at least for some time – as an in-orbit spare,

SAT-00755, File No. SAT-STA-20110127-00017 (Feb. 4, 2011) (Public Notice); *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*, 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).

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

collocated with Galaxy 12.⁷ Intelsat expects to have Galaxy 15 on-station at 133.1° W.L. at the end of March.

During the drift to 133.1° W.L., Intelsat will utilize only the satellite's TT&C frequencies. At 133.1° W.L., Intelsat will operate the satellite's communications payload only if needed in the event of emergency.

The TT&C frequencies are:

6420.5 MHz (V) and 6420.5 MHz (RHC) (uplink)
4198.0 MHz (H), 4199.875 (H), 4198.0 (LHC), and 4199.875 (LHC)
(downlink)

The communications frequencies are:

3700-4200 MHz (space-to-Earth)
5952-6425 MHz (Earth-to-space)

Grant of this STA request is in the public interest. The Commission may grant waiver for good cause shown.⁸ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁹ 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.¹⁰ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

⁷ Intelsat plans eventually to transfer traffic from Galaxy 12 to Galaxy 15 and move Galaxy 12 to 129.0° W.L. Intelsat has a pending waiver request to retain its authority to operate a satellite at the 129.0° W.L. location. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00714, File No. SAT-MS-20100628-00160 (Aug. 27, 2010).

⁸ 47 C.F.R. § 1.3.

⁹ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

¹⁰ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular* 897 F.2d at 1166.

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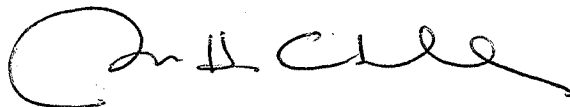
Good cause exists in this case based on hardship. Due to the technical anomaly on the Galaxy 15 satellite, Intelsat initially was unable to comply with the requirements of Section 25.210(j) of the Commission's rules. Now that Intelsat is able to command the satellite, it will ensure the safe drift of Galaxy 15 to 133.1° W.L. by coordinating with all operators in the drift path. Further, Intelsat will ensure that the satellite complies with the Commission's station-keeping requirements while located at 133.1° W.L.

Intelsat 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. Galaxy 15 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, Intelsat 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 Galaxy 15 at 133.1° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 15 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall