

File # SAT-STA-2011-0209-00028

Call Sign S2387 Grant Date 03/31/11

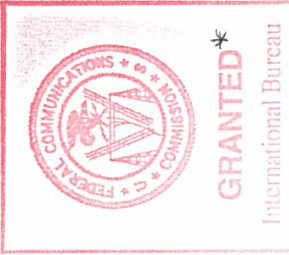
(or other identifier) Term Dates Period of 30 days To:

Approved by OMB 3060-0678

From 03/31/11 Approved: Stephen J. Duall

Stephany J. Duall Chief, Satellite Policy Branch

Date & Time Filed: Feb 9 2011 11:45:20:893AM
File Number: SAT-STA-20110209-00028
Callsign:



FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority for Galaxy 15, Call Sign S2387

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall		

Attachment to Grant
Intelsat License LLC
IBFS File No. SAT-STA-20110209-00028


The application of Intelsat License LLC (formerly PanAmSat Licensee LLC)(Intelsat), IBFS File No. SAT-STA-20110209-00028, for special temporary authority to operate its Galaxy 15 space station, Call Sign S2387, as an in-orbit spare at the 133.1° W.L. orbital location for a period of 30 days IS GRANTED. Accordingly, Intelsat is authorized to operate the Galaxy 15 space station at the 133.1° W.L. orbital location as a non-transmitting (except for Telemetry, Tracking and Telecommand (TT&C) transmissions) in-orbit spare for the duration of this authorization. Intelsat is authorized to conduct TT&C operations using frequencies centered on 6420.5 MHz (Earth-to-space) and 4198.0 MHz and 4199.875 MHz (space-to-Earth) to maintain the Galaxy 15 space station at 133.1° W.L. All operations of the Galaxy 15 space station must be in accordance with the technical specifications set forth in Intelsat's application, Federal Communication Commission (Commission) rules, and the conditions set forth below.

1. All operations shall be on an unprotected and non-harmful interference basis, *i.e.*, the Galaxy 15 space station shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.

2. Intelsat may activate the communications payloads for the Galaxy 15 space station in the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency bands in the event of a service outage of an operational space station.

3. In the event Intelsat activates the communications payload of the Galaxy 15 space station, Intelsat must notify the Commission, in writing, of such activation within three business days of the start of the activation.

4. This action is taken on delegated authority pursuant to 47 C.F.R. § 0.261 and is effective upon release. Petitions for reconsideration under 47 C.F.R. § 1.106 or applications for review under 47 C.F.R. § 1.115 may be filed within 30 days of the date of the Public Notice announcing this action.

 GRANTED * International Bureau * with conditions	File # <u>SAT-STA-20110209-00028</u>
	Call Sign <u>S2387</u> Grant Date <u>03/31/11</u> (or other identifier)
	Term Dates period of From <u>03/31/11</u> To: <u>30 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
Name:	Susan H. Crandall
Company:	c/o Intelsat Corporation
Street:	3400 International Drive, N.W.
City:	Washington
Country:	USA
Attention:	Susan H. Crandall
Phone Number:	202-944-7848
Fax Number:	202-944-7870
E-Mail:	susan.crandall@intelsat.com
State:	DC
Zipcode:	20008 --3006
Relationship:	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CRY – Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input checked="" type="radio"/> Other	
6. Temporary Orbit Location	
7. Requested Extended Expiration Date	

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC, pursuant to Section 25.210 of the rules of the Federal Communications Commission, herein requests Special Temporary Authority for 30 days, from February 14, 2011 through March 15, 2011, to conduct Telemetry, Tracking and Command operations on the Galaxy 15 satellite (call sign S2387) outside of the +/- 0.05 East/West

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.

Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Asst. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

8. Description

Intelsat License LLC, pursuant to Section 25.210 of the rules of the Federal Communications Commission, herein requests Special Temporary Authority for 30 days, from February 14, 2011 through March 15, 2011, to conduct Telemetry, Tracking and Command 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 rules of the Commission as the satellite drifts west from its current location of 93.0 W.L. and to operate the communications payload of Galaxy 15 at 133.1 W.L. as an in-orbit spare.

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.

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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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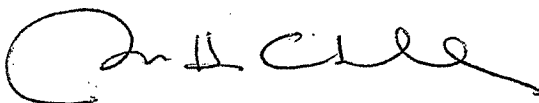
Good cause exists in this case based on hardship. Due to the technical anomaly on the Galaxy 15 satellite, Intelsat initially was unable to comply with the requirements of Section 25.210(j) of the Commission's rules. Now that Intelsat is able to command the satellite, it will ensure the safe drift of 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