

February 23, 2011

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



Re: Request for 30-Day Further Extension of Special Temporary Authority
for Intelsat 3R
Call Sign: PAS-2R

Dear Ms. Dortch:

Intelsat License LLC¹ (“Intelsat”) herein requests an additional 30-day extension -- from March 1, 2011 through March 30, 2011 -- of the Special Temporary Authority (“STA”)² previously granted Intelsat to drift Intelsat 3R (call sign PAS-2R) from 43.1° W.L. to 81.0° W.L. and operate the satellite temporarily at 81.0° W.L. in accordance with the Argentine Administration’s ITU filings in the C- and Ku-bands.³

In 2009, the estimated fuel on the Intelsat 3R satellite resulted in a planned de-orbit date in early-to-mid 2010. Intelsat has since extended the satellite’s estimated End of Maneuver Life through July 31, 2011 after an annual fuel usage evaluation. Intelsat also has a pending 180-day request for special temporary authority to continue to operate Intelsat 3R at 81.0° W.L. in

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 *PanAmSat License Corp. Request for Extension of Special Temporary Authority*, File No. SAT-STA-20110110-00008 (filed Jan. 10, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00713, File No. SAT-STA-20100402-00063 (Aug. 6, 2010); *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).

accordance with the Argentine Administration's ITU filings in the C- and Ku-bands and to extend the license term of the Intelsat 3R satellite through July 31, 2011.⁴

Grant of this STA extension request is in the public interest because it will allow Intelsat to continue to meet customer demand at 81.0° W.L. Continued operation of Intelsat 3R will also allow Intelsat to maximize the utility of its in-orbit assets.

Grant of this STA extension request will not result in increased risk of harmful interference. Intelsat will continue operating the satellite's communications payload at 81.0° W.L. in accordance with Argentina's C- and Ku-band ITU filings. Intelsat incorporates by reference its previously-filed letters demonstrating its authority to operate Intelsat 3R at 81.0° W.L.⁵

As requested in its previous STA extension request, Intelsat also seeks authority to extend the license term of the Intelsat 3R satellite for the duration of this STA.⁶ The Intelsat 3R satellite was launched and placed into service on February 1, 1996.⁷ Pursuant to the satellite's fifteen-year license term, this authorization was to expire on February 1, 2011.⁸ Intelsat now anticipates that Intelsat 3R has sufficient fuel to continue providing service to customers through July 31, 2011.

Grant of this application is consistent with the Commission's end-of-life rules. Intelsat 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, Intelsat anticipates having adequate fuel to de-

⁴ See *PanAmSat Licensee Corp., Request for Special Temporary Authority for Intelsat 3R, (Call Sign PAS-2R)*, File No. SAT-STA-20110110-00009 (filed Jan. 10, 2011).

⁵ *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) (stamp grant with conditions Aug. 3, 2010).

⁶ See *PanAmSat License Corp. Request for Extension of Special Temporary Authority*, File No. SAT-STA-20110110-00008 (filed Jan. 10, 2011)

⁷ See Letter from Joseph A. Godles to Marlene H. Dortch, PanAmSat Licensee Corp. Annual Status Report at 5 (filed June 30, 2005).

⁸ See 47 C.F.R. § 25.121(a).

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orbit the Intelsat 3R satellite to a perigee altitude of 150 km above the geostationary arc. Finally, the requested license extension is consistent with precedent for satellites that are performing well.⁹

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA extension request and extend the license period.

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathyrn Medley
Stephen Duall

⁹ 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).