

March 25, 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 31, 2011 through April 29, 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 1, 2011 after an annual fuel usage

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 *Intelsat License LLC Request for Extension of Special Temporary Authority*, File No. SAT-STA-20110223-00032 (filed Feb. 23, 2011); *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).

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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 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 requests, 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 1, 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

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 *Intelsat License LLC, Request for Extension of Special Temporary Authority*, File No. SAT-STA-20110223-00032 (filed Feb. 23, 2011); *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).

Ms. Marlene H. Dortch

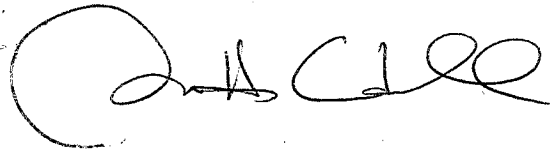
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service to customers through July 1, 2011. At that time, based on standard industry fuel gauging methods, Intelsat anticipates having adequate fuel to de-orbit the Intelsat 3R satellite to a perigee altitude of 150 km above the geostationary arc. Finally, 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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written over a large, faint circular stamp or watermark.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Karl Kensinger
Kathryn 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).