

May 3, 2011

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



Re: Request for Special Temporary Authority to De-Orbit the Intelsat 3R
Satellite, Call Sign PAS-2R

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ herein requests Special Temporary Authority (“STA”), beginning on July 1, 2011 and lasting for a period of thirty days, to de-orbit the Intelsat 3R satellite (Call Sign PAS-2R) from its current location at 81.0° W.L.² and to perform telemetry, tracking and command (“TT&C”) functions with Intelsat 3R during this maneuver.

Grant of this STA is in the public interest. The Intelsat 3R satellite was launched in 1996 and is nearing the end of its useful life. Intelsat seeks to commence de-orbiting the spacecraft sometime between July 1, 2011 and July 30, 2011.

Intelsat intends to de-orbit the Intelsat 3R satellite to a perigee 150 km above synchronous altitude. Intelsat has reserved 27.6 kilograms of fuel for this purpose. To calculate the reserved fuel figure, Intelsat used the “rocket

¹ 47 C.F.R. § 25.120.

² See *Intelsat License LLC Request for Further Extension of Special Temporary Authority*, File No. SAT-STA-20110426-00078 (filed Apr. 26, 2011); *Intelsat License LLC Request for Further Extension of Special Temporary Authority*, File No. SAT-STA-20110325-00063 (filed Mar. 25, 2011); *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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equation” – *i.e.*, it used the expected mass of the satellite at the end of life and the required delta-velocity to achieve the desired orbit. Intelsat has assessed the fuel gauging uncertainty and believes it has provided an adequate margin of fuel reserve to address the uncertainty in the remaining propellant. As a satellite launched prior to March 18, 2002, the minimum perigee requirements for decommissioning set forth in Section 25.283(a) of the Commission’s rules do not apply to Intelsat 3R.³

The de-orbit of Intelsat 3R will not cause any significant risk of harmful interference to other satellites. During the de-orbit, the satellite’s communications payload will remain inactive and only the TT&C payload will operate. Intelsat requests authority to operate the following TT&C frequencies: 6424.5 MHz (H) and 5925.5 MHz (H) (command uplink); 4198.5 MHz (H)(V) and 4199.0 MHz (H)(V) (telemetry downlink). These frequencies will be coordinated and will operate on a non-interference basis.⁴

Finally, consistent with Section 25.283(c), upon completion of de-orbit maneuvers, all stored energy sources will be discharged by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures.⁵

³ 47 C.F.R. § 25.283(d).

⁴ *See* 47 C.F.R. § 25.283(b).

⁵ Intelsat notes that in a recent pleading filed by the Satellite Industry Association (“SIA”), the Intelsat 3R satellite was included as a satellite whose design does not permit all pressure vessels to be relieved at end of life. *See Satellite Industry Association, Request for Blanket Waiver of Section 25.283(c) of the Commission’s Rules*, IB Docket No. 02-54, Annex 1 (filed Oct. 1, 2010). The inclusion of the Intelsat 3R on this list is an error; the Intelsat 3R satellite is capable of venting all stored energy sources at the end of life.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request for special temporary authority to de-orbit the Intelsat 3R satellite.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall