May 23, 2011

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

INTELSAT

Re: Request for 180-day Extension of Special Temporary Authority to Operate Galaxy 15, Call Sign S2387
File No. SAT-STA-20110209-00028

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 a 180-day extension of the Special Temporary Authority ("STA")[2] previously granted Intelsat to operate the Galaxy 15 satellite temporarily as an in-orbit spare at 133.1° W.L.[3]

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 +/- 0.05º East/West station-keeping box pursuant to STA.[4]

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[1] 47 C.F.R. § 25.120.

[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-20110425-00076 (filed Apr. 27, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-STA-20110209-00028 (Apr. 1, 2011) (Public Notice).

[4] Intelsat has operated Galaxy 15 outside its permanently-licensed station-keeping box since April of last year. *See id.*; *Policy Branch Information; Actions Taken*, Report No. 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;*

On December 23, 2010, Galaxy 15 lost Earth lock, all power drained from its battery, and the command unit reset, as it was designed to do.[5] 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 was temporarily 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 determined that the satellite is operating nominally. In February, Intelsat began drifting Galaxy 15 to 133.1° W.L., where it is currently operating as an in-orbit spare collocated with Galaxy 12.

Intelsat plans eventually to transfer traffic from Galaxy 12 to Galaxy 15 and move Galaxy 12 to 129.0° W.L.[6] In order to accommodate certain customers that wish to refrain from moving back to Galaxy 15 until the satellite has experienced two eclipse seasons after control was regained, Intelsat plans to keep Galaxy 12 and Galaxy 15 collocated until after the fall eclipse, which ends in mid-October. Following the fall eclipse, and subject to receipt of FCC

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).

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

[6] 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-MSC-20100628-00160 (Aug. 27, 2010).

approval, Intelsat plans to transition customers back onto Galaxy 15[7] and subsequently drift Galaxy 12 to 129.0° W.L.

While at 133.1° W.L., Intelsat will continue to utilize only the satellite's TT&C frequencies unless the satellite's communications payload is 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)

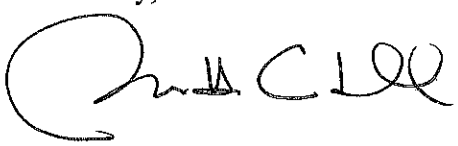
The communications frequencies are:

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

Grant of this STA request is in the public interest because it will allow Galaxy 15 to continue operating temporarily as an in-orbit spare until it is placed back into primary service at 133.0° W.L. as planned. To the extent necessary, Intelsat asks that the waiver previously granted Intelsat to operate Galaxy 15 outside its permanently licensed station-keeping box at 133.0° W.L. be continued.[8]

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

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[7] Traffic transfer will occur with both satellites located at 133.0° W.L. Intelsat will seek authority to move Galaxy 15 from 133.1° W.L. to 133.0° W.L. prior to the time traffic transfer will occur.

[8] *See supra* note 4.

cc: Robert Nelson
Karl Kensinger
Kathyrn Medley
Stephen Duall