

May 24, 2011

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



Re: Request for Further 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”) herein requests a further 30-day extension – from May 29, 2011 through June 27, 2011 – of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to operate the Galaxy 15 satellite temporarily as an in-orbit spare at 133.1° W.L.² Intelsat also has a pending 180-day request for special temporary authority to continue to operate Galaxy 15 at 133.1° W.L.³ Because the 180-day request cannot be granted before the current STA expires, however, Intelsat seeks this further extension.

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.⁴

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$830.00 filing fee electronically via the International Bureau’s Filing System.

² See Intelsat License LLC, Request for Special Temporary Authority to Operate Galaxy 15, (Call Sign S2387), File No. SAT-STA-20110425-00076, (filed April 25, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-STA-20110209-00028 (Apr. 1, 2011) (Public Notice).

³ See *Intelsat License LLC, Request for Special Temporary Authority to Operate Galaxy 15*, (Call Sign S2387), File No. SAT-STA-20110523-00094 (filed May 23, 2011).

⁴ Intelsat has operated Galaxy 15 outside its permanently-licensed station-keeping box since April of last year. See *supra* note 2; *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*,

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 12.⁶

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).

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

⁶ Intelsat expects 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-MSA-20100628-00160 (Aug. 27, 2010).

Ms. Marlene H. Dortch

May 24, 2011

Page 3

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)

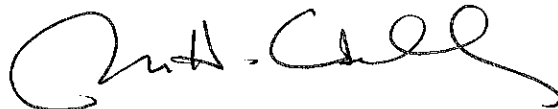
The communications frequencies are:

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

Grant of this STA extension 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 expected. 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.⁷

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

cc: Robert Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

⁷ See *supra* note 4.