

July 26, 2011

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



Re: Request for Extension of 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 a 30-day extension - from July 31, 2011 through August 29, 2011 - of the Special Temporary Authority (“STA”)² previously granted Intelsat to de-orbit Intelsat 3R (call sign PAS-2R) from 81.0° W.L. and to perform telemetry, tracking and command (TT&C”) functions with Intelsat 3R during this maneuver.³

Grant of this STA extension request is in the public interest as it will allow Intelsat to continue de-orbiting Intelsat 3R. As Intelsat informed the Commission, it began de-orbiting maneuvers on July 6, 2011.⁴ As present, Intelsat is continuing to perform burns to deplete the tanks.

As noted in its initial STA request, 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 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.⁵

¹ 47 C.F.R. § 25.120.

² Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau’s Filing System.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00787, File No. SAT-STA-20110503-00083 (Jun. 17, 2011).

⁴ See Letter from Susan H. Crandall, Intelsat, to Mr. Robert Nelson, FCC, File No. SAT-STA-20110503-00083 (June 28, 2011).

⁵ 47 C.F.R. § 25.283(d).

Marlene H. Dortch, Secretary

July 26, 2011

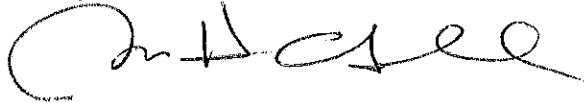
Page 2

The de-orbit of Intelsat 3R will not cause any significant risk of harmful interference to other satellites. During the continued de-orbit, the satellite's communications payload will remain inactive and only the TT&C payload will operate. Intelsat requests authority to continue operating 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 continue to be coordinated and operated on a non-interference basis.⁶

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.⁷

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Bob Nelson
Karl Kensinger
Kathryn Medley
Stephen Duall

⁶ See 47 C.F.R. § 25.283(b).

⁷ 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.