

September 15, 2011

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



Re: Request for Special Temporary Authority to Drift Galaxy 15
Call Sign S2387

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days, commencing October 1, 2011, to drift Galaxy 15 (call sign S2387) from 133.10° W.L. to 133.0° W.L. At that location, Galaxy 15 will operate consistent with the authorization obtained prior to the satellite experiencing a technical anomaly.

Galaxy 15 is currently located at 133.10° W.L.² Intelsat expects to begin drifting Galaxy 15 from 133.10° W.L. to 133.0° W.L. on October 1, 2011 and have the satellite on-station at 133.0° W.L. approximately two to three weeks later. At the 133.0° W.L., the Galaxy 15 satellite will be temporarily co-located with the Galaxy 12 satellite (call sign S2422)³ to allow for transfer of customer traffic from Galaxy 12 to Galaxy 15. At 133.0° W.L., Intelsat will operate Galaxy 15 pursuant to the satellite's existing authorization.⁴

Following the transfer of traffic from Galaxy 12 to Galaxy 15, Intelsat plans to operate Galaxy 12 for a short period of time at 132.9° W.L. as an in-orbit spare.⁵ Thereafter, and subject to receipt of FCC approval, Galaxy 12 will be relocated to 129° W.L.⁶

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00795, File No. SAT-STA-20110523-00094 (Jul. 22, 2011) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File Nos. SAT-MOD-20100120-00013 and SAT-AMD-20100514-00102 (Oct. 22, 2010) (Public Notice)

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00233, File Nos. SAT-LOA-19991207-00119, SAT-AMD-20040603-00111, SAT-AMD-20031103-00320, SAT-AMD-20030818-00156, SAT-AMD-20021029-00199 (Aug. 13, 2004) (Public Notice) (authorizing operation of Galaxy 15 at the 133.0° W.L. orbital location).

⁵ Intelsat separately is filing a request for STA for Galaxy 12.

⁶ Intelsat expects to relocate Galaxy 12 to 129° W.L. in mid-December 2011.

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During the drift of Galaxy 15 from 133.10° W.L. to 133.0° W.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

Uplink:

6420.5 MHz (V)

6420.5 MHz (RHC)

Downlink:

4198.0 MHz (H)

4199.875 (H)

4198.0 (LHC)

4199.875 (LHC)

Grant of this STA request is in the public interest. The authority requested will facilitate Galaxy 15's previously approved provision of service to customers at 133.0° W.L. It will also restore the Galaxy 15 satellite to operational service following the April 5, 2010 anomaly.

Moreover, grant of this STA request will not result in increased risk of harmful interference. As noted above, during the drift of Galaxy 15 from 133.1° W.L. to 133.0° W.L., Intelsat will utilize only the TT&C frequencies listed above and will coordinate the drift with all operators in the drift path.

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley