

January 15, 2010

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



Re: Request for Special Temporary Authority  
Castle Rock, Colorado Earth Station KL-92

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days, from February 21, 2010 through March 22, 2010, to use its Castle Rock, Colorado Ku-band earth station -- call sign KL-92 -- to provide in-orbit testing ("IOT") services at 48.0° W.L. for the Intelsat 16 satellite that is expected to be launched on February 11, 2010.

Upon launch and subject to receipt of FCC approval, Intelsat 16 will be located temporarily at 48.0° W.L.<sup>2</sup> The satellite's permanent location ultimately will be 58.1° W.L.<sup>3</sup>

The Intelsat 16 IOT operations will be performed at 48.0° W.L. in the following frequency bands: 13750-14500 MHz, 12750-12762 MHz and 12788-13250 MHz in the uplink and 11700-12200 MHz and 10700-11450 MHz in the downlink. PanAmSat has coordinated the proposed IOT transmissions with operators of all satellites operating co-frequency with Intelsat 16 up to six degrees away from 48.0° W.L. Specifically, PanAmSat has internally coordinated the proposed testing with the following of its satellites: Intelsat 705 (call sign S2395) at 50.0° W.L., Intelsat 707 (call sign S2398) at 53.0° W.L., Intelsat 1R (call sign S2368) at 50.0° W.L., Intelsat 14 (call sign S2785) at 45.0° W.L., Intelsat 3R (call sign PAS-2R) at 43.1° W.L., and Intelsat 11 (call sign S2237) at 43.0° W.L. In addition, PanAmSat has coordinated with NASA, which operates the TDRSS 3 and TDRSS 4 satellites at 49.0° W.L. and 46.0° W.L., respectively.

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<sup>1</sup> PanAmSat has filed its STA request, an FCC Form 159, a \$175.00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

<sup>2</sup> See *Intelsat North America LLC Request for Special Temporary Authority*, File No. SAT-STA-20100111-00007 (filed Jan. 11, 2010).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice).

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In further support of this request, PanAmSat is attaching Exhibits A through E, which contain technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility.<sup>4</sup> In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, PanAmSat will take all reasonable steps to eliminate the interference.

The in-orbit testing of the Intelsat 16 satellite at 48.0° W.L. is a critical step in ensuring that the satellite will be fully operational at 58.1° W.L. This, in turn, will result in additional capacity at the nominal 58.0° W.L. location, and thereby promote the public interest.

Please direct any questions regarding this STA request to the undersigned at (202) 944-7848.

Respectfully submitted,



Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Kathryn Medley

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<sup>4</sup> As shown in the exhibits, operation of this earth station in the 13.770-13.780 GHz band will be subject to the EIRP constraints required to ensure compliance with the FCC's Report and Order regarding operations in the 13.75-14.0 GHz band. *See Amendment of Part 2, 25 and 90 of the Commission's Rules to Allocate the 13.75-14.0 GHz Band to the Fixed Satellite Service*, 11 FCC Rcd 11951 (1996).