

April 23, 2010

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



Re: Request for Special Temporary Authority
Clarksburg, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for three days, from May 3, 2010 through May 5, 2010, to use its Clarksburg, Maryland C-band earth station -- call sign KA275 -- to communicate with the Galaxy 15 satellite while it is located at 132.5 +/- 0.1° W.L. 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 has drifted outside of its authorized +/- 0.05° East/West station-keeping box.² Intelsat will utilize the transmissions contemplated herein in an attempt to disable the communications payload on the Galaxy 15 satellite. Intelsat will take this action only if all ongoing efforts to regain control of Galaxy 15 have not been successful by May 3.

In the course of the three days of operations, during one or more periods of up to three hours, the earth station will be transmitting simultaneously to the 24 transponders of the Galaxy 15 satellite. There will be one 10 MHz carrier transmitted to each of the transponders. The characteristics of these carriers, including the exact frequencies and corresponding power density and EIRP density are provided in Exhibit A of this application.

The carriers transmitted will be within the antenna's licensed parameters and will generate at 131° W.L., or at any other location occupied by a non-Intelsat satellite, an off-axis EIRP density that is within levels mandated by the FCC's two-degree spacing requirements. As such, the operations of other lawfully permitted terrestrial radio communication facilities will not be subject to

¹ Intelsat 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").

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (Apr. 16, 2010). Intelsat will very shortly file an STA request to allow operation of the Galaxy 15 communications payload at 132.5 +/- 0.1° W.L. for purposes of the transmissions contemplated herein.

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electromagnetic interference levels above the levels that they would receive for normal operation of the earth station in accordance with the terms of its license.

In support of this, Intelsat has conducted an interference analysis with respect to non-Intelsat geostationary satellites with C-band operations up to six degrees from the Galaxy 15 satellite during the relevant time period. The results of these analyses, reported in Exhibit B, indicate that there will be a reduction of uplink interference to SES's AMC-11 satellite at 131.04° W.L., compared to the interference level resulting from the applicable off-axis EIRP density levels of Section 25.218 of the FCC's rules (corresponding to a power density level of -2.7 dBW/4kHz transmitted by an antenna just meeting the specifications in Section 25.209 of the FCC's rules). The uplink interference level into other relevant SES satellites – AMC-10 and GE-7 – will also be reduced as the proposed operations will be further away from those satellites. Intelsat is discussing with SES the transmissions contemplated herein and has provided SES with the emergency contacts listed below in the event that harmful interference occurs.

ESOC Satellite Control Center – (202) 944-7701

Knut Tjonneland, Director, Satellite Engineering – (202) 438-1527

Grant of this STA request will allow Intelsat to attempt to disable the communications payload on the Galaxy 15 satellite should ongoing attempts to regain control of the spacecraft prove unsuccessful. If this attempt to disable the communications payload is successful, it will greatly reduce the likelihood of Galaxy 15 causing potential interference into the operations of other operators, thereby promoting 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