

May 14, 2010

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



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

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”) herein requests Special Temporary Authority (“STA”)<sup>1</sup> for 23 days—from May 19, 2010 through June 10, 2010—to use its Clarksburg, Maryland earth station (call sign KA275) to provide emergency communications services in the 3700-4200 MHz and 5925-6425 MHz conventional C-band frequencies to the AMC-11 satellite (call sign S2433) at the nominal 131° W.L. orbital location. The AMC-11 satellite is licensed to SES Americom, Inc. (doing business as “SES WORLD SKIES”).

This STA request seeks temporary authority to add communications services, including video and data, as approved services for KA275. The emission designators for the proposed services are 36M0G7W (digital video and data), 36M0F7D (digital data), and 36M0F8W (analog video and data).

The KA275 earth station is not currently licensed to provide communications services. Instead, the license specifies telemetry, command and ranging services, and the emission designators in the license reflect that use. However, the KA275 earth station already contains the ALSAT designation, authorizing communications with all U.S.-licensed satellites including AMC-11. The KA275 earth station also is authorized to use the conventional C-band frequencies from 3700-4200 MHz and 5925-6425 MHz and has been coordinated for operations in these frequencies for the portion of the satellite arc where AMC-11 operates. The KA275 antenna will operate consistent with the power levels specified in its existing authorization when providing communications services.

Grant of this STA request will serve the public interest. As the Commission is aware, the Galaxy 15 satellite (call sign S2387) operated by Intelsat’s sister company, PanAmSat Licensee Corp. (“PanAmSat”), experienced an anomaly on April 5, 2010 and is currently drifting East in an uncontrolled manner

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and a \$175.00 filing fee electronically via the International Bureau’s Filing System.

toward the nominal 131° W.L. orbital location, where AMC-11 operates. The requested authority will allow PanAmSat and SES WORLD SKIES to mitigate potential interference and minimize service disruptions. Use of the 19m antenna in Clarksburg, MD will facilitate the successful transmission of C-band communications traffic during the period of time that Galaxy 15 drifts through the nominal 131° W.L. orbital location. Specifically, the KA275 earth station will uplink communications traffic to AMC-11 as the satellite maneuvers to the East and then to the West to avoid an in-orbit collision with Galaxy 15. The FCC has granted flexibility for the AMC-11 satellite to operate outside its licensed 131° W.L. station-keeping box to maintain a .3 to .5 degree separation between the two satellites.<sup>2</sup> The large size and advanced tracking capabilities of the KA275 earth station will best ensure uninterrupted signals during these maneuvers. As a result, grant of the requested STA will minimize service disruptions for customers.

In addition, grant of this request will not adversely affect other satellite service providers. Intelsat and SES WORLD SKIES are coordinating the proposed use of the KA275 earth station for communications services with the AMC-11 satellite. Intelsat or PanAmSat operate the closest C-band satellites to the nominal 131° W.L. orbital location -- *i.e.*, Galaxy 12 (call sign S2422) at nominal 133° W.L.<sup>3</sup> and Galaxy 13 (call sign S2386) at nominal 127° W.L. Intelsat does not expect that its proposed provision of communications services using the KA275 earth station will cause harmful interference to either of its adjacent satellites and will coordinate internally the proposed operations.

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<sup>2</sup> SES Americom, Inc. requested and received STA to drift the AMC-11 satellite 0.5 degrees to the east and west of its assigned orbital location of 131° W.L. (*i.e.*, between 130.5° W.L. and 131.5° W.L.) for a period of thirty days, commencing on May 20, 2010. *See SES Americom Inc., Application for Special Temporary Authority to Drift and Operate AMC-11*, File No. SAT-STA-20100430-0086 (filed Apr. 30, 2010) (grant stamped May 12, 2010).

<sup>3</sup> *See PanAmSat Licensee Corp. Request for Special Temporary Authority to Drift and Operate Galaxy 12 (call sign S2422)*, File No. SAT-STA-20100408-00070 (filed Apr. 8, 2010) (grant-stamped Apr. 9, 2010); *PanAmSat Licensee Corp. Request for Extension of STA to Drift and Operate Galaxy 12*, File No. SAT-STA-20100430-00089 (filed Apr. 30, 2010) (grant-stamped May 11, 2010).

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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: Kathryn Medley  
Stephen Duall