

June 16, 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  
Clarksburg, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for seven days, from June 24, 2010 through June 30, 2010, to use its Clarksburg, Maryland C-band earth station -- call sign KA275 -- to communicate with the Galaxy 15 satellite while it is located from 129.5° W.L. to 128.5° 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 pursuant to STA.<sup>2</sup> Intelsat will utilize the transmissions contemplated herein in a second 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 June 24.

From June 24, 2010 through June 30, 2010, during one or more periods of up to three hours each day, 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

---

<sup>1</sup> 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").

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (Apr. 16, 2010) (Public Notice); *Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100430-00087 (May 7, 2010) (Public Notice); *Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (Jun. 11, 2010) (Public Notice).

Ms. Marlene H. Dortch

June 16, 2010

Page 2

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 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 the other relevant SES satellite – AMC-10 – will also be reduced as the proposed operations will be further away from those satellites. Intelsat 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 for a second time to disable the communications payload on the Galaxy 15 satellite should ongoing attempts to regain control of the spacecraft prove unsuccessful. If such an 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 satellites, thereby promoting the public interest.

Intelsat agrees to accept the following condition, which was included in Intelsat's prior grant of special temporary authority to use the KA275 earth station in an attempt to disable the Galaxy 15 satellite's communications payload:<sup>3</sup>

All operations shall be on an unprotected and non-harmful interference basis, i.e., Intelsat North America LLC, shall not cause harmful interference to, and shall not claim protection from, interference caused

---

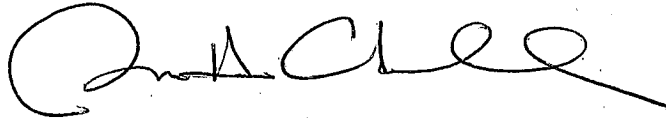
<sup>3</sup> Request for Special Temporary Authority for Clarksburg, MD Earth Station KA275, File No. SAT-STA-20100426-00084 (stamp grant with conditions Apr.29, 2010).

Ms. Marlene H. Dortch  
June 16, 2010  
Page 3

to it by any other lawfully operating station and it shall cease  
transmission(s) immediately upon notice of such interference.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Kathryn Medley