

July 2, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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”)¹ for 30 days—from July 8, 2010 through August 6, 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 Galaxy 13 satellite (call sign S2386) at 127.0° W.L. and the Galaxy 14 (call sign S2385) at the nominal 125.0° W.L. orbital location.

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 Galaxy 13 and Galaxy 14. 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 Galaxy 13 and Galaxy 14 operate. 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

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

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toward the Galaxy 13 and Galaxy 14 satellites. The requested authority will allow Intelsat 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 127° W.L. and 125° W.L. orbital locations. Specifically, the KA275 earth station will uplink communications traffic to Galaxy 13 and Galaxy 14. Galaxy 13 will remain in its station-keeping box, and Galaxy 14 may have to maneuver up to 0.03° to the East and West to avoid a collision with Galaxy 15.² 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. The only C-band satellite within 6° of the nominal orbital locations 127° W.L. or 125° W.L. which is not operated by Intelsat or PanAmSat is AMC-11 at 131° W.L. Provision of communications services using the KA275 earth station will not cause harmful interference to AMC-11 because operations will be conducted in compliance with the FCC 2-degree conditions. Actually, given the earth station size (19.0 m) the EIRP towards AMC-11 (off-axis angles of 4° and 6°) will be well within acceptable values. For the same reason, Intelsat does not expect that its proposed provision of communications services using the KA275 earth station will cause harmful interference to any of the satellites operated by Intelsat or PanAmSat.

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

² PanAmSat will file a separate request for special temporary authority to operate the Galaxy 14 satellite outside its authorized station-keeping box.

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Sincerely,

/s/ Jennifer D. Hindin

Wiley Rein LLP
Counsel to Intelsat

On behalf of:

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Kathryn Medley
Stephen Duall