

August 3, 2010

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



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

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”), pursuant to Section 25.210 of the rules of the Federal Communications Commission (“FCC or “Commission”),<sup>1</sup> herein requests an additional 30 days—from August 7, 2010 through September 5, 2010—of the Special Temporary Authority (“STA”)<sup>2</sup> previously granted Intelsat 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.<sup>3</sup> Intelsat will provide emergency communications services to the Galaxy 18 satellite (call sign S2733) at 123.0° W.L., the Galaxy 23 satellite (call sign S2592) at 121.0° W.L., and the ANIK-F3 satellite licensed to Telesat (call sign S2703) at 118.7° W.L.<sup>4</sup>

This STA extension 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

---

<sup>1</sup> 47 C.F.R. § 25.120.

<sup>2</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.

<sup>3</sup> *See Policy Branch Information; Actions Taken*, Report No. SES-01261, File No. SES-STA-20100702-0865 (July 14, 2010) (Public Notice).

<sup>4</sup> Intelsat anticipates using KA275 with Galaxy 18 from August 9-19, 2010, with Galaxy 23 from August 20-31, 2010 and with ANIK-F3 from September 2-12, 2010. These dates may fluctuate based on the Galaxy 15 satellite’s drift.

Ms. Marlene H. Dortch

August 3, 2010

Page 2

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 18) and non-U.S. licensed satellites on the U.S. Permitted List (including Galaxy 23 and ANIK-F3). 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 18, Galaxy 23 and ANIK-F3 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 toward the Galaxy 18, Galaxy 23 and ANIK-F3 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 123.0° W.L., 121.0° W.L., and 118.7° W.L. orbital locations. Specifically, the KA275 earth station will uplink communications traffic to Galaxy 18, Galaxy 23 and ANIK-F3. Galaxy 18, Galaxy 23 and ANIK-F3 will remain in their station-keeping boxes. 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 extension will minimize service disruptions for customers.

In addition, grant of this request will not adversely affect other satellite service providers. Intelsat and Telesat are coordinating the proposed use of the KA275 earth station for communications services with the ANIK-F3 satellite. C-band satellites within 6° of the orbital locations 123.0° W.L., 121.0° W.L. and 118.7° W.L. which are not operated by Intelsat or PanAmSat are SatMex 5 (116.8° W.L.), Solidaridad 2 (114.9° W.L.) and SatMex 6 (113.0° W.L.). Provision of communications services using the KA275 earth station will not cause harmful interference to any of these three satellites because operations will be conducted in compliance with the FCC two-degree conditions. Actually, given the earth station size (19.0 m), the EIRP towards any of these satellites 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.

Ms. Marlene H. Dortch

August 3, 2010

Page 3

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