August 27, 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 September 3, 2010 through October 2, 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 Anik F3 satellite at 118.7º W.L., Satmex 5 satellite at 116.8º W.L., and Solidaridad 2 satellite at 114.9° W.L. The Commission has previously granted a very similar request for STA with one of the same satellites as a point of communication.[2]

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 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 Anik F3, Satmex 5, and Solidaridad 2 operate. The KA275 antenna will operate consistent with the power levels specified in its existing authorization when providing communications services. Moreover, the KA275 earth station already contains the ALSAT designation, authorizing communications in the conventional C-band with all non-U.S.-licensed

[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.

[2] *See Policy Branch Information; Actions Taken*, Report No. SES-01269, File No. SES-STA-20100803-00984 (rel. Aug. 11, 2010) (Public Notice).

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satellites on the Permitted Space Station List, including Anik F3, Satmex 5, and Solidaridad 2.

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 Anik F3, Satmex 5, and Solidaridad 2 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 118.7° W.L., 116.8° W.L., and 114.9° W.L. orbital locations. Specifically, the KA275 earth station will uplink communications traffic to Anik F3, Satmex 5, and Solidaridad 2. Anik F3, Satmex 5 and Solidaridad 2 will remain in their respective 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 will minimize service disruptions for customers on these three satellites.

In addition, grant of this request will not adversely affect other satellite service providers. The only C-band satellites within 6º of the orbital locations 118.7º W.L. or 116.8º W.L., or 114.9° W.L. which are not operated by Intelsat or PanAmSat are Satmex 6 at 113º W.L. and Anik F2 at 111.1° W.L. Provision of communications services using the KA275 earth station will not cause harmful interference to Satmex 6 or Anik F2 because operations will be conducted in compliance with the FCC's two-degree conditions. Actually, given the earth station size (19.0 m) the EIRP density levels toward Satmex 6 (off-axis angles of 1.9º, 3.8, and 5.7º) and Anik F2 (off-axis angles of 3.8°, 5.7° and 7.6°) 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.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais
Kathyrn Medley