

November 23, 2010

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



Re: Request for Further 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"), herein requests an additional 30 days – from December 2, 2010 through December 31, 2010 – of the Special Temporary Authority ("STA")¹ 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.² Intelsat will begin providing such services to the AMC-1 satellite at 103° W.L., SES-1 satellite at 101° W.L. and the Galaxy 16 satellite at 99° W.L.³

This request seeks extension of the special temporary authority previously granted Intelsat 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).

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-01292, File No. SES-STA-20101027-01352 (Nov. 3, 2010); Actions Taken, Report No. SES-01288, File No. SES-STA-20100927-01212 (Oct. 20, 2010) (Public Notice); Policy Branch Information; Actions Taken, Report No. SES-01275, File No. SES-STA-20100827-01102 (Sept. 1, 2010) (Public Notice).*

³ Intelsat anticipates using KA275 with AMC-1 on December 4, 2010, SES-1 on December 15, 2010 and Galaxy 16 on December 25, 2010. These dates may fluctuate based on the Galaxy 15 satellite's drift.

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 AMC-1, SES-1 and Galaxy 16 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 U.S.-licensed satellites and non-U.S.-licensed satellites on the Permitted Space Station List.

Grant of this STA extension 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 AMC-1, SES-1, and Galaxy 16 satellites. The requested authority will allow Intelsat to mitigate potential interference and minimize service disruptions. Use of the 19 m 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 103° W.L., 101° W.L., and 99° W.L. orbital locations. Specifically, the KA275 earth station will uplink communications traffic to AMC-1, SES-1 and Galaxy 16. AMC-1, SES-1 and Galaxy 16 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 this time period. As a result, grant of the requested STA will minimize service disruptions for customers on these satellites.

In addition, grant of this extension request will not adversely affect other satellite service providers. The C-band satellites within 6° of the orbital locations 103° W.L., 101° W.L., or 99° W.L. that are not operated by Intelsat or PanAmSat are Anik F1 and Anik F1R, both at 107.3° W.L., and AMC-18 at 105° W.L. Provision of communications services using the KA275 earth station will not cause harmful interference to these satellites because operations will be conducted in compliance with the FCC's two-degree conditions. Actually, given the earth station size (19 m), the EIRP density levels toward 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.

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

Sincerely,

A handwritten signature in cursive script that reads "Susan H. Crandall / dj".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais
Kathryn Medley
Jeanette Spriggs