

December 6, 2010

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



Re: Request for Special Temporary Authority
Riverside, California Earth Station E040125

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, beginning as soon as possible, to use its Riverside, California earth station -- call sign E040125 -- to provide back-up TT&C services to the Galaxy 15 satellite in an effort to recover the satellite. 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. Although Intelsat is seeking immediate authority, actual transmissions to Galaxy 15 will not occur until the satellite begins to off-point and tumble. This is expected to occur some time in the month of December 2010.

Currently, earth station call sign E030307 (Ellenwood, Georgia) receives only telemetry from Galaxy 15. When this off-point occurs, the satellite's TT&C will be transferred to earth station call sign KA275 (Clarksburg, Maryland) or to its primary back-up, E040125, or to its secondary back-up, E4132 (Fillmore, California).² When tumbling, the Galaxy 15 satellite is expected to be located in a slightly inclined geostationary orbit (up to 0.6 degrees), at an orbital longitude that could be anywhere between 101° W.L. and 97° W.L.

The Galaxy 15 emergency TT&C operations will be performed in the following frequency bands:

- 6420.5 MHz (V/RHCP) in the uplink, and
- 4198 MHz or 4199.875 MHz (H/LHCP) in the downlink

The transmitted eirp for nominal recovery operations will be 85 dBW. That eirp level could be exceeded – up to the maximum antenna capability – in the

¹ 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").

² STA requests are being filed for all three antennas.

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case of emergency. During recovery operations, the E040125 antenna will operate (if needed) largely within its licensed parameters, except for the slight inclination of the orbit. Accordingly, no additional coordination with terrestrial services is necessary.

The proposed Galaxy 15 recovery operations have been coordinated with operators of all satellites that could potentially be affected. As such, Intelsat does not expect any harmful interference into lawfully operating radiocommunication facilities during recovery operations. Nevertheless, all operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

Grant of this STA request will allow Intelsat to potentially recover the Galaxy 15 satellite and return it to a location where it can operate without causing interference. This, in turn, will promote the public interest by removing the threat of interference into other operators currently posed by Galaxy 15, as well as returning the satellite to regular operation.

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

Respectfully submitted,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Paul Blais
Kathryn Medley