

January 7, 2011

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 14 days -- from January 15, 2011 through January 28, 2011 -- to use its Clarksburg, Maryland earth station (call sign KA275) to transmit to the Galaxy 15 satellite at 93° W.L. in the 3700-4200 MHz and 5925-6425 MHz C-band frequencies for purposes of testing to determine the functionality of every aspect of the satellite.

As the Commission is aware, on April 5, 2010, the Galaxy 15 satellite operated by Intelsat's sister company, PanAmSat Licensee Corp. ("PanAmSat"), suffered an anomaly of unknown origin. Due to this anomaly, the satellite drifted outside of its authorized +/- 0.05° East/West station-keeping box pursuant to STA.²

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 *Intelsat North America LLC Request for Further Extension of Temporary Authority*, File No. SAT-STA-20101228-00268 (stamp grant issued by Stephen J. Duall, with conditions, on Jan. 7, 2011); *Policy Branch Information; Actions Taken*, Report No. SAT-00741, File No. SAT-STA-20101129-00248 (Dec. 3, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00735, File No. SAT-STA-20101029-00227 (Nov. 5, 2010) (Public Notice); *Actions Taken*, Report No. SAT-00727, File No. SAT-STA-20100929-00203 (Oct. 8, 2010); *Actions Taken*, Report No. SAT-00720, File No. SAT-STA-20100830-00185 (Sep. 10, 2010) (Public Notices); See *Policy Branch Information; Actions Taken*, Report No. SAT-00715, File No. SAT-STA-20100803-00172 (Aug. 13, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00706, File No. SAT-STA-20100628-00149 (Jul 9, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00698, File No. SAT-STA-20100601-00118 (Jun. 11, 2010) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00687, File No. SAT-STA-20100430-00087

On December 23, 2010, Galaxy 15 lost Earth lock, all power drained from its battery, and the command unit reset, as it was designed to do.³ Shortly thereafter, Galaxy 15 began accepting commands and PanAmSat began receiving telemetry from the satellite. The satellite initially was placed in Sun acquisition mode for diagnostic testing. On December 27, 2010, after the spacecraft's batteries were fully charged and the satellite was thermally balanced, Galaxy 15 was placed in Earth acquisition mode.

Currently, Galaxy 15 is drifting to 93.0° W.L., where it will be collocated with Galaxy 25, which is operated by Intelsat at 93.10° W.L.⁴ PanAmSat expects to have Galaxy 15 on-station at 93.0° W.L. on or about January 15, 2011,⁵ where it plans immediately to begin in-orbit testing the satellite's communications payload as requested herein.

The KA275 earth station is currently licensed to provide telemetry, command and ranging services, and the emission designators in the license reflect that use. For purposes of the Galaxy 15 testing, Intelsat will be transmitting an unmodulated carrier, with an eirp ranging from 50 dBW to 65 dBW and an eirp density not exceeding 65 dBW/4kHz. These values are lower than the maximum eirp and eirp density levels in the license.

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 that includes 93° W.L. Moreover, the KA275 earth station already contains the ALSAT designation, authorizing communications in the conventional C-band with all U.S.-licensed satellites.

As noted above, the KA275 antenna will operate consistent with the power levels specified in its existing authorization. As such, no terrestrial

(May 7, 2010); *Policy Branch Information; Actions Taken*, Report No. SAT-00682, File No. SAT-STA-20100409-00071 (Apr. 16, 2010) (Public Notice).

³ The satellite's communications payload had earlier shut off as a result of power loss.

⁴ See *Intelsat North America LLC Request for Further Extension of Temporary Authority*, File No. SAT-STA-20101228-00268 (filed Dec. 28, 2010). The STA further extension request includes authority to operate the satellite's TT&C frequencies on-station at 93.0° W.L.

⁵ Once the satellite is on-station, PanAmSat will perform station-keeping maneuvers to reduce its inclination and place it in the required +/- .05 station-keeping box.

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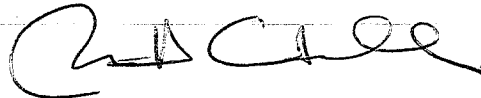
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coordination is required. Moreover, the proposed testing will be coordinated with operators of all satellites that could potentially be affected. As such, Intelsat does not expect any harmful interference into lawfully operating radiocommunications facilities during the testing. Nevertheless, all operators of potentially affected satellites 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 assess the health of Galaxy 15 following the loss and subsequent recovery of ability to command the satellite. Assuming a successful outcome to the testing, this will in turn help Intelsat return the satellite to commercial operation at either 129° W.L or 133° W.L., thereby serving the public interest.

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

Sincerely,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais
Kathryn Medley