

January 26, 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 License LLC (“Intelsat”) (f/k/a Intelsat North America LLC) herein requests Special Temporary Authority (“STA”)¹ for seven days -- from January 31, 2011 through February 6, 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 in the event that Intelsat decides to conduct further testing of the satellite.

As the Commission is aware, on April 5, 2010, the Galaxy 15 satellite 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 *Policy Branch Information; Actions Taken*, Report No. SAT-00750, File No. SAT-STA-20101228-00268 (Jan. 14, 2011) (Public Notice); *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 (May 7, 2010); *Policy Branch Information; Actions Taken*,

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 Intelsat 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 located at 93.0° W.L., where it is collocated with Intelsat's Galaxy 25, which is operated at 93.10° W.L. Intelsat has been conducting tests to determine the functionality of every aspect of the satellite.⁴ Intelsat herein seeks further authority in the event that it or its customers wish to conduct additional testing while the satellite is located at 93.0° W.L.

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 93.0° 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 coordination is required. Moreover, the proposed testing will be coordinated

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00751, File No. SAT-STA-20110107-00007 (Jan. 21, 2011) (Public Notice); *Satellite Communications Services Information; Actions Taken*, Report No. SES-01313, File No. SES-STA-20110107-00027 (Jan. 19, 2011) (Public Notice).

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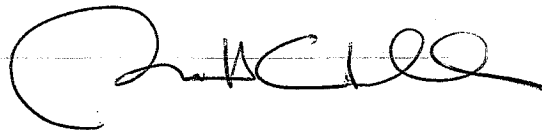
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with operators of all satellites that could potentially be affected. As such, Intelsat does not expect any harmful interference into lawfully operating radiocommunications facilities during the testing. Nevertheless, all operators of potentially affected 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 further 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,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written over a horizontal dashed line.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais
Kathryn Medley