

February 27, 2008

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



Re: Request for Extension of Special Temporary Authority to Operate
Galaxy 17's TT&C Frequencies at 73.95° W.L.
Call Sign: S2715

Dear Ms. Dortch:

PanAmSat Licensee Corp. ("PanAmSat") herein requests a 30-day extension -- through April 7, 2008 -- of the Special Temporary Authority ("STA")¹ originally granted to PanAmSat to drift Galaxy 17 from 74.05° W.L. to 73.95° W.L. immediately following traffic transfer from Galaxy 17 to Horizons 2 at 74.05° W.L. and to temporarily operate Galaxy 17's TT&C frequencies at 73.95° W.L.² In support of its request, PanAmSat submits the following information.

PanAmSat is authorized to operate Galaxy 17 at 91° W.L.³ PanAmSat currently plans to have Galaxy 17 replace Galaxy 11, which is operating at that location. As a business precaution, however, PanAmSat moved Galaxy 17 to 73.95° W.L. and is temporarily operating only the satellite's TT&C frequencies at that location rather than drifting the satellite to its permanent location of 91° W.L. As explained in the original STA request, PanAmSat's Galaxy 18, which is licensed to operate at 123° W.L., currently is expected to be launched on May 3, 2008 by Sea Launch. That launch date, however, may be delayed if the launch of the satellite ahead of Galaxy 18 on the launch manifest is delayed. The satellite currently operating at 123° W.L. -- Galaxy 10R -- is low on fuel. If the launch of Galaxy 18 is delayed beyond the date that Galaxy 10R must be placed in inclined orbit operations, then PanAmSat will seek FCC authority to drift

¹ PanAmSat has filed this STA request, an FCC Form 159 and a \$790.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00498, File No. SAT-STA-20080110-00007 (Feb. 1, 2008) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00439, File Nos. SAT-RPL-20061219-00155 and SAT-AMD-20070123-00013 (Apr. 27, 2007) (Public Notice).

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Galaxy 17 to 123° W.L. and temporarily operate it at that location in order to ensure continuity of station-kept service for customers currently on Galaxy 10R.

Because the satellite ahead of Galaxy 18 is not scheduled to launch until March 9, 2008 -- after the current STA has expired, PanAmSat seeks this extension to allow Galaxy 17 to remain at 73.95° W.L. until after that launch has occurred and PanAmSat is fairly certain that Galaxy 18's launch will not be delayed.

While the satellite is temporarily located at 73.95° W.L., only the following TT&C frequencies will continue to be operated on Galaxy 17: command frequencies 5925.5 MHz (LHCP), 6424.5 MHz (RHCP), 5925.5 MHz (H) and 6424.5 MHz (V); telemetry frequencies 4197.125 MHz (H), 4197.125 MHz (LHCP), 4198.875 MHz (H) and 4198.875 (RHCP).

As noted above, the satellite ahead of Galaxy 18 on the launch manifest is currently scheduled for launch on March 9, 2008. Thus, PanAmSat expects to know by mid-March whether it needs to deploy Galaxy 17 temporarily at 123° W.L. If Galaxy 17 is needed at 123° W.L., PanAmSat will immediately request STA to drift the satellite to -- and temporarily operate it at -- that location.

All operations of Galaxy 17 at 73.95° W.L. will continue to be in conformance with relevant coordination agreements PanAmSat has reached with other administrations regarding operations at the nominal 74.0° W.L. location. In addition, PanAmSat will continue to operate in accordance with the FCC's rules designed to allow co-frequency, co-coverage operations in a two-degree spaced environment. As a result of these efforts, PanAmSat's continued operation of Galaxy 17 at the 73.95° W.L. location poses no risk of harmful interference to adjacent operational satellites.

Grant of this STA request will serve the public interest by allowing PanAmSat to conserve Galaxy 17's fuel -- and thus operational life -- until PanAmSat determines whether the satellite is needed at 123° W.L. to ensure continuity of service as a result of a delay in the launch of Galaxy 18.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Robert Nelson
Andrea Kelly
Karl Kensinger
Jabin Vahora