

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

SEP 17 2003

Federal Communications Commission
Office of Secretary

Satellite Division

Int'l Bureau

SEP 23 2003

Front Office

In the Matter of)

LOCKHEED MARTIN CORPORATION)

Amendment of Applications to)
The Launch and Operate Satellites in)
Radio Navigation Service)

File Nos.: SAT-AMD-20030730 00149/
150/151/152/153

Call Signs: S2370; S2371; S2372; S2374; S2375

Received

SEP 29 2003

Policy Branch
International Bureau

COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby comments on the above-captioned amendment ("Amendment") of Lockheed Martin Corporation ("Lockheed") to its applications for authority to launch and operate a Regional Positioning System global radionavigation satellite service using L-band frequencies.¹ PanAmSat's comments are limited to Lockheed's requests to: (1) change the proposed orbital location of one of its proposed satellites; and (2) use extended C-band frequencies for tracking, telemetry and control ("TT&C") at the new orbital location. PanAmSat has no objection to Lockheed's application as amended, but is filing these comments to bring to the Commission's attention the need for Lockheed to coordinate these elements of its Amendment with PanAmSat.

¹ See Public Notice, Report No. SAT-00160 (Aug. 18, 2003). See also File Nos. SAT-LOA-19990427-00045/46/47/49/50.

DISCUSSION

In its Amendment, Lockheed proposes that one of its space stations be located at 125° W.L. instead of 129° W.L. as initially proposed. Implementation of this proposal will require careful coordination with PanAmSat for stationkeeping purposes, because PanAmSat already operates Galaxy V, a C-band satellite, at 125° W.L. Furthermore, the Commission has granted special temporary authority for PanAmSat to relocate SBS-4, a Ku-band satellite, to 125° W.L. Thus, Lockheed's space station would be the third space station to be located at 125° W.L. PanAmSat and Lockheed already have begun discussions to address the stationkeeping issue, and PanAmSat has every reason to believe these discussions will be successful.

Lockheed proposes to use the extended C-band for its TT&C operations at 125° W.L.² This proposal also will require careful coordination with PanAmSat, to avoid out-of band emissions causing interference to PanAmSat's transmissions via Galaxy V in the standard C-band.³ PanAmSat and Lockheed have initiated coordination

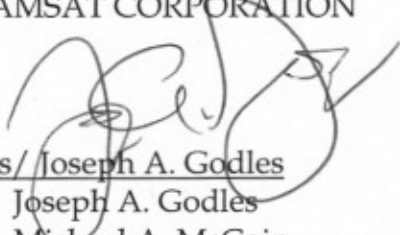
² See Amendment at Table 4.1.1.

³ As used in these comments, the standard C-band refers to the 3700-4200 MHz and 5925-6425 MHz frequency bands.

discussions concerning this issue as well, and PanAmSat believes that the discussions will be successful.

Respectfully submitted,

PANAMSAT CORPORATION


By: /s/ Joseph A. Godles
Joseph A. Godles
Michael A. McCain

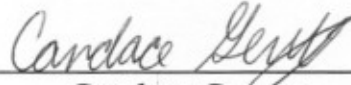
GOLDBERG, GODLES, WIENER & WRIGHT
1229 Nineteenth Street, N.W.
Washington, D.C. 20036
(202) 429-4900
Its Attorneys

September 17, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by first-class mail, postage prepaid, this 17th day of September 2003, to the following:

David S. Keir
Leventhal Senter & Lerman PLLC
2000 K Street, N.W.
Suite 600
Washington, DC 20006-1809



Candace Gentry