

November 12, 2008

FILED/ACCEPTED

NOV 12 2008

Federal Communications Commission  
Office of the Secretary

VIA HAND DELIVERY

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



Re: DIRECTV Amendment Application  
SAT-AMD-20080916-00188

Dear Ms. Dortch:

Intelsat North America LLC (“Intelsat”) submits this letter supporting the November 10, 2008 Response of DIRECTV Enterprises, LLC (“DIRECTV”) to the October 27, 2008 Comments of EchoStar Corporation (“EchoStar”) regarding the above referenced 17/24 GHz Broadcasting Satellite Service (“BSS”) amendment application (“Amendment Application”) that is a key component of the Orbital Location Rationalization Agreement (“Rationalization Agreement”) among DIRECTV, Intelsat and Pegasus Development DBS Corporation (“Pegasus”) designed to maximize the operational capabilities of their proposed systems at the nominal 91° W.L., 99° W.L. and 107° W.L. orbital locations. DIRECTV correctly states that while EchoStar faults the Rationalization Agreement for not resolving all situations where there are multiple applicants for a single orbital location, EchoStar should not be allowed “to make the perfect the enemy of the good.”<sup>1</sup>

The Commission has urged 17/24 GHz applicants to “reach a compromise regarding their orbital assignment requests and minimize, or avoid, mutually exclusive situations.”<sup>2</sup> The Rationalization Agreement does just that -- by removing mutual exclusivity at two locations and reducing the number of parties at a third. As such, the Rationalization Agreement and the Amendment Application are in the public interest. The fact that EchoStar is not a party to

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<sup>1</sup> Response of DIRECTV Enterprises, LLC at 2 (filed Nov. 10, 2008), File No. SAT-AMD-20080916-00188.

<sup>2</sup> See *Establishment of Policies and Serv. Rules for the Broad. Satellite Serv. at the 17.3-17.7 GHz Frequency Band and at the 17.7-17.8 GHz Frequency Band Internationally, and at the 24.75-25.25 GHz Frequency Band for Fixed Satellite Servs. Providing Feeder Links to the Broad.-Satellite Serv. and for the Satellite Servs. Operating Bi-directionally in the 17.3-17.8 GHz Frequency Band*, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd. 8842, 8902 (¶ 146) (2007).

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the Rationalization Agreement does not provide a basis for the Commission to deny DIRECTV's Amendment Application.

Please contact the undersigned should you have any questions.

Regards,

A handwritten signature in blue ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

**CERTIFICATE OF SERVICE**

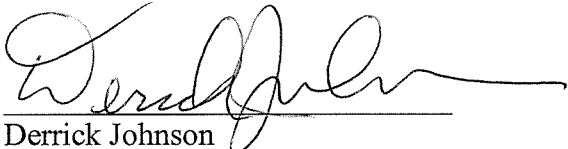
I, Derrick Johnson, do hereby certify that on this 12<sup>th</sup> day of November, 2008, I served a true and correct copy of the foregoing letter of Intelsat North America LLC to the following:

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*Counsel for EchoStar Corporation*

  
Derrick Johnson

\*By Hand Delivery

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