



Federal Communications Commission
Washington, DC 20554

International Bureau

December 21, 2010

Susan Crandall
Intelsat North America LLC
c/o Intelsat Corporation
3400 International Drive, N.W.
Washington, DC 20008-3006

Re: Application to Launch and Operate Galaxy KA at
89.1° W.L., IBFS File Nos. SAT-LOA-20090227-
00029; SAT-AMD-20100302-00038 (Call Sign:
S2787)

Dear Ms. Crandall:

Intelsat North America LLC (“Intelsat”) has a pending request for authority to construct, launch and operate the Galaxy KA space station at the 89.1° W.L. orbital location to provide Fixed-Satellite Services (including Direct-to-Home services) using the 29.5-30.0 GHz (Earth-to-space) and 19.7-20.2 GHz (space-to-Earth) frequency bands.¹ In order to make a public interest determination regarding this request, we seek additional information pursuant to 25.111(a) of the Commission’s rules.²

Intelsat states that Galaxy KA will replace the Ka-band operations of Galaxy 28, an in-orbit space station operating at the 89.0° W.L. orbital location. Intelsat seeks authority to operate the Galaxy KA space station in the same Ka-band frequencies as those authorized for the Galaxy 28 space station, with the same geographic coverage area as Galaxy 28, but from the 89.1° W.L. orbital location.³

In order to develop a more complete record regarding the nature of the services that are intended to be replaced, please indicate whether Galaxy 28 will cease to operate in the 29.5-30.0 GHz (Earth-to-space) and 19.7-20.2 GHz (space-to-Earth) frequency bands at the 89.0° W.L. orbital location once Galaxy KA is launched and operational. Please also indicate if Galaxy 28 is currently providing service to customers in these bands. If so, we ask Intelsat to indicate whether Intelsat anticipates transferring these customers to Galaxy KA after that satellite is launched and operational, or whether Intelsat has other arrangements to ensure continuation of service to these

¹ Application to Launch and Operate Galaxy KA at 89.1° W.L., IBFS File Nos. SAT-LOA-20090227-00029; SAT-AMD-20100302-00038.

² 47 C.F.R. § 25.111(a).

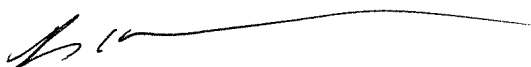
³ Originally, Intelsat also sought authority to operate Galaxy KA in the 18.3-18.8 GHz (space-to-Earth) and the 28.35-28.6 GHz and 29.25-29.5 GHz (Earth-to-space) frequency bands, but the request to use these additional frequency bands that are not authorized on the Galaxy 28 space station was removed as part of an amendment filed by Intelsat on March 2, 2010. See IBFS File No. SAT-AMD-20100302-00038.

customers. Intelsat should generally provide a description of the types of services offered, the specific frequency bands being used to provide these services, the number of customers, and duration of provision of service from Galaxy 28 at this location using the Ka-bands.

In addition, we note that Galaxy 28 was launched in June 2005 and that its current authorization to operate in the 29.5-30.0 GHz and 19.7-20.2 GHz bands does not expire until July 29, 2020. Accordingly, we ask Intelsat to explain why it seeks to replace the Ka-band capacity on Galaxy 28 at this time.

We request that Intelsat respond to this letter by January 21, 2011. Failure to do so may result in the dismissal of Intelsat's pending request to launch and operate the Galaxy KA space station pursuant to Section 24.112(c) of the Commission's rules, 47 C.F.R. § 25.112(c).

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

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