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March 24, 2005

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

MAR 24 2005  
Federal Communications Commission  
Office of Secretary

**Re: Identification of Satellites Co-Located with AMC-12 (File  
No. SAT-MOD-20020517-00078 et al., Call Sign S2415)**

Dear Ms. Dortch:

Columbia Communications Corporation ("Columbia"), by its attorneys, hereby provides the report required pursuant to the above-referenced Commission authorization. The Commission on January 28, 2005 granted launch and operational authority for AMC-12 at 37.5° W.L.<sup>1</sup> The terms and conditions of the authorization require that Columbia provide a written statement identifying satellites that will be located at or near the assigned orbital location of AMC-12 and describing the measures that will be taken to prevent in-orbit collisions. *Id.* at ¶ 14.

AMC-12 will provide follow-on C-band capacity for Satcom C-1, which currently operates at 37.5° W.L. Loral holds a license to operate its Telstar 11 Ku-band spacecraft at 37.5° W.L. Columbia is not aware of any other FCC- or non-FCC-licensed spacecraft that are operational or planned to be deployed at or near 37.5° W.L. whose stationkeeping volume would overlap with that of AMC-12. Columbia and Loral have discussed joint stationkeeping arrangements at the 37.5° W.L. orbital location. Pursuant to those discussions, Columbia has agreed to seek Commission authority to operate AMC-12 centered at 37.45° W.L. with 0.05 degree stationkeeping tolerance, and Loral has agreed to seek Commission authority to operate Telstar 11 centered at 37.55° W.L. with 0.05 degree

<sup>1</sup> *Columbia Communications Corporation, Order and Authorization*, DA 05-244 (Sat. Div. rel. Jan. 28, 2005).

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stationkeeping tolerance.<sup>2</sup> Assuming authority for the offset is granted by the Commission, there will be no overlap in the stationkeeping volumes of AMC-12 and Telstar 11.

The Massachusetts Institute of Technology's Lincoln Laboratories advises Columbia regarding government spacecraft and other objects that approach or might enter an assigned stationkeeping volume of Columbia's operational spacecraft. Columbia coordinates either through Lincoln Labs or the other commercial satellite operator with respect to any actions that are appropriate at those times to avoid any risk of collision.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,



Karis A. Hastings  
Counsel for Columbia Communications Corp.

cc: Karl Kensinger  
Robert Nelson  
Diane Garfield

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<sup>2</sup> Columbia recently filed a request for Special Temporary Authority to operate AMC-12 at 37.45° W.L. (File No. SAT-STA-20050316-00065) and is preparing a modification application to seek permanent assignment of AMC-12 to 37.45° W.L.