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March 20, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: SAT-MOD-20060306-00024 Additional Information to Update the Record

Loral Skynet Corporation (Loral) writes to provide updated information to assist the Commission in making its decision to approve the above-referenced application.

In March 2006, Loral submitted the above referenced application to modify Condition #11 of its replacement satellite authorization (File No. SAT-MOD-20011130-00118) which requires that Telstar 11N must begin providing service contemporaneously with the discontinuation of service on Telstar 11.

In its application, Loral explained that it discovered that an unexpectedly large amount of fuel had been consumed during the launch process and that, with the best estimate available at the time, sufficient fuel remained on the satellite to ensure operations, consistent with the technical requirements in the Commission's rules, until June 2006.

Prior to filing its application, Loral engaged the services of two firms to help it assess the accuracy of the estimates of the amount of fuel remaining aboard the satellite. After months of study and comparison of differing results, Loral now concludes with a high degree of certainty that sufficient fuel remains to continue to operate the satellite in its assigned orbital position at least until the end of 2007. Because only a small amount of fuel is necessary for inclined orbit station-keeping, small increases in the indirectly measured amount of fuel remaining can result in a longer estimated operating life.

Updated Launch Status of Telstar 11N

While this updated fuel analysis is helpful, it does not guarantee that Telstar 11 can continue to be operated until Telstar 11N is launched, tested, and ready-for-service at 37.55°WL.

The current construction Schedule for Telstar 11N anticipates that satellite construction will be completed and the spacecraft will be ready for delivery to the launch site before the end of June 2008. However, at this time, the planned launch vehicle is the Boeing Land Launch. In light of the recent Sea Launch failure and the fact that virtually all of the rocket components of the Sea Launch and Land Launch vehicles are the same, neither launcher will resume flight until the launch investigation and requisite remediation is complete. Further, resumption of Sea Launches must also wait until repairs to the Sea Launch platform are completed. As a result, Loral cannot, today, definitively state when Telstar 11N will be launched.

Loral's Practices for End of Life Disposal

Approval of Loral's request for modification of the continuity of service obligation will promote placement of Telstar 11 in a safe graveyard altitude. Loral Skynet and its predecessor, AT&T Skynet, have always taken seriously their responsibility to protect the serviceability of the orbital arc by ensuring that retired satellites are raised to a graveyard orbit that is sufficiently above the geostationary arc to ensure that no risk of collision exists. Even prior to the Commission's codification of a minimum graveyard altitude based on the Interagency Space Debris Coordination Committee (IADC) formula in §25.283 of the rules, the company established a target altitude of GEO +300 km as a suitable graveyard altitude. Although Telstar 11 is grandfathered from having to apply the IADC formula to calculate the minimum graveyard orbit altitude, barring a premature depletion of fuel, Loral will make its best efforts to ensure that Telstar 11 will be raised to a safe graveyard altitude. Eliminating the need to maintain Telstar 11 at 37.55° until Telstar 11N is launched simply to satisfy the continuity of service license condition would further ensure placement in an graveyard orbit at a time when sufficient fuel remains to achieve the IADC's recommended altitude.

Preservation of U.S. ITU Priority

Grant of the pending modification request would also facilitate the preservation of U.S. Ku-band ITU priority at the nominal 37° W.L. orbital location. Based on current fuel predictions, Loral anticipates continuation of operations of Telstar 11 in inclined orbit at least until the end of 2007, which will ensure that the current U.S. satellite registration will remain valid until the end of 2009. This two-year window will enable Loral and its

spacecraft manufacturer to accommodate unanticipated schedule slippage that might occur in the delivery of Telstar 11 N.

Loral has already taken steps to ensure continuity of service for its customers

As described in the text of the original application, on pages 5 and 6 (inserted below), Loral has taken steps to ensure continuity of service for its customers:

Loral Skynet has ensured continuity of service by relocating Telstar 11 customers to suitable alternative satellite capacity until the launch of Telstar 11N. At its own expense, Loral Skynet has provided Telstar 11 customers with significant service engineering, operations and program management support in order to make the transition to alternative satellite capacity as seamless as possible. For each of these customers, Loral Skynet coordinated individual transmission plan changes and permitted dual-illumination periods (at no additional charge) to allow proper antenna re-pointing. In some instances, Loral Skynet sent ground operators to customer locations to install equipment and/or re-point their networks. Loral Skynet's program management team took the lead in the network migration to minimize customer impact. Loral Skynet also took measures to ensure that its access management facility was ready for migrations that involved multiple sites over a short period of time. Upon launch of Telstar 11 N, Loral Skynet will migrate these customers back to 37.55° W.L. and provide service incentives and other service engineering, operations and program management support arrangements to assist customers with the transition.

There currently are no customers on Telstar 11N and therefore removal of Condition #11 will not inconvenience any customers.

In addition to the steps noted above, Loral has attempted to obtain a gap-filler satellite from various other operators in order to continue serving customers. Such efforts, however, have been unsuccessful.

In consideration of the revised fuel data described above, the uncertainty of a firm launch date, Loral's desire to preserve the U.S. satellite registration at 37.55°WL, and raise Telstar 11 to a suitable graveyard altitude, Loral reiterates its request that the Commission act promptly to modify the Telstar 11N authorization to remove Condition #11 – continuity of service.

Very truly yours,



George F. Wazeter
Director, Regulatory Affairs

cc: Robert Nelson
Karl Kensinger
Richard Engelman

CERTIFICATE OF SERVICE

I hereby certify that, on this 26th day of March, 2007, a copy of the foregoing
Opposition of DIRECTV Enterprises, LLC was served by hand delivery upon:

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson L.L.P.
555 13th Street, N.W.
Washington, DC 20004



Alex Reynolds