

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

Application of)
)
Intelsat North America LLC)
) File No. SAT-MOD-20090309-00034
For Modification of Authorization for the) (S2469)
Galaxy 26 Space Station to Relocate to the)
50.75° E.L. Orbital Location)
)
)

INTELSAT NORTH AMERICA LLC RESPONSE TO COMMENTS

Intelsat North America LLC (“Intelsat”), by its attorneys, hereby responds to the Comments of New Skies Satellites B.V. (“New Skies”) regarding the above-referenced application for modification of the license to relocate the Galaxy 26 satellite to the 50.75° E.L. orbital location.¹ New Skies requests that the International Bureau (“the Bureau”) impose conditions on grant of the pending application to safeguard the rights of other satellite operators with superior International Telecommunication Union (“ITU”) date priority at the same and nearby orbital locations. Intelsat has always complied with ITU filing requirements and priority and will do so for operation of Galaxy 26 at 50.75° E.L. as well. Intelsat anticipated that the Commission would condition grant of the pending modification application for Galaxy 26 on compliance with the standard conditions associated with ITU priority and agrees to accept them.

Intelsat has requested authority to operate Galaxy 26 pursuant to new U.S. filings at the

¹ See Comments of New Skies Satellites B.V., IBFS File No. SAT-MOD-20090309-00034 (filed Apr. 27, 2009) (“NSS Comments”).

ITU,² which have already been submitted to the ITU.³ Intelsat understands that these filings will have a lower ITU priority than certain existing filings, and is aware of longstanding Commission policy, which requires lower priority satellites to coordinate with any higher priority satellites.⁴ At the request of entities with higher ITU priority, the Commission has also previously imposed the same conditions requested by New Skies.⁵ Intelsat does not dispute this Commission policy, or the FCC's authority to impose these conditions, and agrees to accept them.

Respectfully submitted,

WILEY REIN LLP

By: /s/ Jennifer D. Hindin

Bert W. Rein
Jennifer D. Hindin
Carl R. Frank
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
TEL: 202.719.7000

Attorneys for Intelsat North America LLC

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² Intelsat North America LLC, Application for Modification of Authorization for the Galaxy 26 Space Station to Relocate to the 50.75° E.L. Orbital Location, File No. SAT-MOD-20090309-00034 at 3 (filed Mar. 9, 2009).

³ USASAT-600 and USABSS-32 covering, respectively, the FSS and BSS frequencies on Galaxy 26.

⁴ *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order, 18 FCC Rcd 10,760, 10,870-71 (¶ 296) (2003).

⁵ *See, e.g., Loral Spacecom Corporation, Petition for Declaratory Ruling to Add Telstar 13 to the Permitted Space Station List*, Order, 18 FCC Rcd 16,374, 16384-85 (¶ 31) (2003); *Star One S.A., Petition for Declaratory Ruling to Add the Star One C5 Satellite at 68° W.L. to the Permitted Space Station List*, Order on Reconsideration, 23 FCC Rcd 10896 (¶ 6) (2008).

CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of May, 2009, a copy of the foregoing Response of Intelsat North America LLC was served by hand delivery upon:

Joslyn Read
Vice President, Regulatory Affairs
SES NEW SKIES
2001 L Street, NW
Washington, DC 20036
202-478-7100

William M. Wiltshire
HARRIS, WILTSHIRE & GRANNIS LLP
1200 Eighteenth Street, NW
Washington, DC 20036
202-730-1300

/s/ Pam Conley
Pam Conley