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# LATHAM & WATKINS<sup>LLP</sup>

November 30, 2011

## VIA ELECTRONIC FILING

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

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**Re: Request of Intelsat License LLC for Extension of STA, IBFS File Nos. SAT-STA-20111123-00227; SAT-STA-20110923-00185; SAT-STA-20110727-00137; SAT-STA-20110314-00053; SAT-MOD-20110420-00073 (Call Sign S2469)**

Dear Ms. Dortch:

Al Yah Satellite Communications Company PrJSC (“Yahsat”) comments on the above-referenced request filed on November 23, 2011 by Intelsat License LLC (“Intelsat”). Through its request, Intelsat seeks an extension of the special temporary authority (“STA”) previously granted to allow Intelsat to operate the Galaxy 26 satellite at 50.0° E.L. on a temporary basis.<sup>1</sup>

Yahsat incorporates by reference its prior pleadings in this proceeding, and continues to oppose granting Intelsat the operating authority that it requests until a clear coordination agreement is reached between the parties.<sup>2</sup>

As Yahsat previously has explained: (i) the proposed operations of Galaxy 26 are technically incompatible with the YAHSAT-1A satellite, which is now fully operational at 52.5° E.L.; (ii) Intelsat bears the burden of successfully coordinating Galaxy 26 with YAHSAT-1A;

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<sup>1</sup> See IBFS File No. SAT-STA-20111123-00227.

<sup>2</sup> See Comments of Al Yah Satellite Communications Company PrJSC (Jun. 6, 2011); Reply Comments of Al Yah Satellite Communications Company PrJSC (Jul. 1, 2011); Al Yah Satellite Communications Company Response to Surreply (Aug. 29, 2011); Letter of Al Yah Satellite Communications Company PrJSC (Oct. 5, 2011) (filed in the above-referenced proceedings).

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and (iii) such coordination has not been effectuated.<sup>3</sup> Moreover, operation of YAHSAT-1A's Ku-band payload has commenced, and all Ku-band channels are expected to be fully utilized by the end of March 2012. For those reasons, Yahsat requests that if the Commission does extend Intelsat's STA for another 60 days, the Commission continue to require that Intelsat: (i) operate on a non-harmful interference basis; and (ii) operate at PFD levels below the hard limits established in Condition ¶ 6.b to Intelsat's existing STA.<sup>4</sup>

Please contact the undersigned should you have any questions.

Sincerely yours,

/s/ John P. Janka

John P. Janka  
Jarrett S. Taubman

*Counsel for Al Yah Satellite  
Communications Company PrJSC*

cc: Susan H. Crandall, Intelsat  
Jennifer D. Hindin, Wiley Rein LLP  
Joslyn Read, New Skies Satellites B.V.  
Karis A. Hastings, Hogan Lovells US LLP  
Robert Nelson, International Bureau  
Kathryn Medley, International Bureau  
Stephen Duall, International Bureau

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<sup>3</sup> The parties met to discuss coordination on November 15-16, 2011 but no resolution was reached.

<sup>4</sup> See IBFS File No. SAT-STA-20110923-00185, Grant, Condition 6.b ("Intelsat must operate Galaxy 26 in accordance with the BSS PFD limits specified in the ITU Radio Regulations, Appendix 30, Annex 1, Sections 1(a) and 4, for protection of co-frequency BSS and terrestrial operators.").