



Wiley Rein & Fielding LLP

ORIGINAL

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

Virginia Office
7925 JONES BRANCH DRIVE
SUITE 6200
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

June 1, 2006

Received

JUN 05 2006

Policy Branch
International Bureau

RECEIVED

JUN - 1 2006

Jennifer D. Hindin
202.719.4975
jhindin@wrf.com

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

Federal Communications Commission
Office of Secretary

Re: **Petition for a Declaratory Ruling Adding Anik F3 at 118.7° W.L. to the Permitted List, SAT-PPL-20060516-00061, Call Sign S2703**

Dear Ms. Dortch:

Telesat Canada ("Telesat"), by its attorneys, files this letter pursuant to Section 1.65 of the rules of the Federal Communications Commission ("FCC")¹ to provide additional information relevant to the above-captioned petition for declaratory ruling adding the C- and Ku-band payloads of Anik F3, a satellite to be located at 118.7° W.L., to the FCC's Permitted Space Station List (the "Permitted List"). This letter provides supplemental information regarding orbital debris mitigation as required by Section 25.114(d).

As requested by the International Bureau, Telesat confirms that the orbital debris information submitted by EchoStar Satellite LLC ("EchoStar") in its application for blanket authorization to operate one million receive-only earth stations in the Ku-band to receive Direct-to-Home ("DTH") Fixed Satellite Services ("FSS") from the Anik F3 satellite² is accurate and should be incorporated by reference into Telesat's petition. Specifically, Telesat verifies that upon mission completion, Anik F3 will be maneuvered to a disposal orbit with a minimum perigee of about 280 km above the normal GSO operational orbit, based on the IADC formula:

- Area-to-mass ratio ("A/M") = 0.0437 m²/kg
- Solar Pressure Radiation Coefficient (worst case) (C_R) = 1

¹ 47 C.F.R. § 1.65.

² See *EchoStar Satellite, LLC Application for Authorization to Operate 1,000,000 Receive-Only Earth Stations to Provide Direct-to-Home Fixed Satellite Service in the United States Using the Canadian-authorized ANIK F3 Satellite at the 118.7° W.L. Orbital Location*, File Nos. SES-LFS-20040831-01253, SES-AMD-20051118-01599, SES-LIC-20050621-00799 SES-AMD-20051118-01601, Order and Authorization, 20 FCC Rcd 20,083 (Int'l Bur. 2005) ("EchoStar Order").

June 1, 2006

Page 2

Therefore, the Minimum Disposal Orbit Perigee Altitude will be equal to

$$\begin{aligned} &= 36,021 \text{ km} + 1000 \times C_R \times A/M \\ &= 36,021 \text{ km} + 1000 \times 1 \times 0.0437 \text{ m}^2/\text{kg} \\ &= 36,064.7 \text{ km} \\ &= 278.7 \text{ km above GSO} \end{aligned}$$

Additionally, the amount of fuel reserved for disposal will be 10.6 kg, as noted by EchoStar in its application.

Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,



Jennifer D. Hindin
Counsel for Telesat Canada

cc: Andrea Kelly