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March 25, 2005

BY HAND DELIVERY

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

RECEIVED

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Federal Communications Commission
Office of Secretary

**Re: STA Request to Operate AMC-12 at 37.45° W.L.
File No. SAT-STA-20050316-00065, Call Sign S2415**

Dear Ms. Dortch:

Columbia Communications Corporation ("Columbia"), by its attorneys, hereby supplements the record with respect to its above-referenced application for special temporary authority to operate AMC-12 at 37.45° W.L. rather than its assigned orbit location of 37.5° W.L. AMC-12 is currently drifting towards 37.5° W.L. and is scheduled to arrive there on April 3. For the reasons discussed herein, Columbia seeks expedited grant of its STA request prior to that date.

AMC-12 will provide follow-on C-band capacity for Satcom C-1, which is licensed to Columbia's parent company, SES Americom, Inc. ("SES Americom"). There is only a single customer that will transition from Satcom C-1 to AMC-12. Columbia and SES Americom are currently working with that customer to develop a transition plan. The transition is not a simple "hot cut" because the customer will not be remaining on the same frequency. The most likely scenario is that Columbia will turn on and configure all of AMC-12 except for the frequency the Satcom C-1 customer is currently using. When the customer transitions over to its new frequency on AMC-12, SES Americom will terminate communications services over Satcom C-1, and Columbia will activate the remaining frequencies on AMC-12. This process may occur over several days, between approximately April 5 and April 7.

Satcom C-1 is currently collocated at 37.5° W.L. with Loral's Telstar 11 Ku-band spacecraft. Both Satcom C-1 and Telstar 11 are in inclined orbit. The motion of these spacecraft occupies a large amount of the stationkeeping volume at 37.5° W.L. However, currently the motion is somewhat synchronized, and the

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operators have been maintaining separation of the two by eccentricity. Bringing a fully stationkept satellite into that same area presents a risk to safe operation of the satellites because the new spacecraft would not have the same daily motion in the box that the two inclined spacecraft do. Thus, what is currently a difficult task of maintaining two inclined orbit satellites in the same stationkeeping volume will become much more complicated if AMC-12 must also share the same volume when it arrives.

Service to customers could also be adversely affected. A high eccentricity would be required to maintain separation of AMC-12 from the other satellites. The eccentricity would not affect the video service customer currently using Satcom C-1 but could impact the performance of smaller signal customers that are expected to use capacity on AMC-12.

To avoid these risks, Columbia urges the Commission to grant the AMC-12 STA request and Loral's pending request to operate Telstar 11 at 37.55° W.L. (File No. SAT-STA-20050321-00067) on an expedited basis. Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,



Peter A. Rohrbach
Karis A. Hastings
Counsel for Columbia Communications Corp.

cc: Fern Jarmulnek
Andrea Kelly
Robert Nelson