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JUL 21 2006

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July 14, 2006

RECEIVED

JUL 14 2006

Federal Communications Commission
Office of Secretary

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

Re: Requests for Special Temporary Authority
File Nos. SAT-STA-20060627-00070,
SAT-STA-20060628-00071

Dear Ms. Dortch:

On June 27 and June 28, 2006, PanAmSat Licensee Corp. ("PanAmSat") filed the above-referenced requests seeking special temporary authority ("STA") to operate the Ku-band payload on PAS-9 at 26.15° E.L. On July 7, 2006, Eutelsat S.A. ("Eutelsat") filed comments concerning PanAmSat's STA requests. Although Eutelsat did not oppose a grant of the STA requests, it raised questions concerning the sufficiency of PanAmSat's technical showing. PanAmSat, by its undersigned counsel, hereby responds to the concerns raised by Eutelsat.

In its STA requests, PanAmSat provided an adjacent satellite interference analysis with respect to various satellites that are located in the vicinity of 26.15° E.L. Eutelsat maintains that PanAmSat, as part of its interference showing, also needs to conduct a link analysis with respect to Eutelsat's Eurobird 2 satellite, which is located at 25.8° E.L., and its Hot Bird 1 satellite, which according to Eutelsat will be deployed at 25.5° E.L. at the beginning of September 2006.¹ Eutelsat asserts that a link analysis is needed to establish "whether and to what extent PAS-9 will be able to operate in the

¹ Eutelsat further states that Eurobird 2 will be redeployed to 25.5° E.L. in March 2007.

Ku-band without causing harmful interference to Eutelsat's Eurobird 2 satellite and HotBird 1 satellite."²

Eutelsat has misperceived the nature of PanAmSat's showing. PanAmSat is not attempting to demonstrate that the Ku-band payload on PAS-9 can operate without causing interference to Eurobird 2 and HotBird 1 in the event that all of the transponders on all three satellites are operated at the same time. Rather, PanAmSat is acknowledging that the only way the Ku-band transponders on PAS-9 at 26.15° E.L. can be operated is if the operations are coordinated with Eutelsat. When an interference showing is based on coordination, there is no need to provide a link analysis.

Prior to filing its STA requests, PanAmSat obtained a commitment from Arabsat in writing, a copy of which is attached to this letter, to the effect that Arabsat had to, and would, coordinate with Eutelsat prior to making use of the Ku-band payload on PAS-9. In its STA requests, moreover, PanAmSat made explicit reference to the need to coordinate with Eutelsat. The reference was limited to Eurobird 2, because PanAmSat was unaware at the time that Eutelsat planned to station HotBird 1 at 25.5° E.L. Now that Eutelsat has made its plans known, PanAmSat acknowledges that any coordination must take into account the operations of both Eurobird 2 and HotBird 1.

On another issue, Eutelsat asserts that the Commission should put on public notice PanAmSat's initial STA request, which sought authority for a 30-day period, and which was followed by a 180-day STA request. There is no basis for this assertion. As Eutelsat recognizes, "the International Bureau may grant an STA of up to 30 days without submitting the request to public notice,"³ and the Bureau has issued STAs for up to 30 days on numerous occasions without resorting to a public notice. Moreover, Eutelsat already has had a full opportunity to make its positions known, and the Bureau can take those positions - and PanAmSat's response - into account before taking action. The only impact of putting PanAmSat's 30-day STA request on public notice would be to delay Arabsat's access to capacity that it sorely needs because one of its satellites has failed.

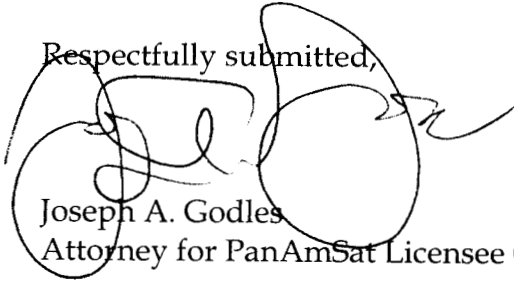
² Comments of Eutelsat at 5-6 (footnotes omitted).

³ Comments of Eutelsat at 6.

Marlene H. Dortch
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Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Godles", is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

Joseph A. Godles
Attorney for PanAmSat Licensee Corp.

cc: Stefan M. Lopatkiewicz (via e-mail)

GOLDBERG, GODLES, WIENER & WRIGHT



TELEFAX MESSAGE

From: ARABSAT, RIYADH- KSA
Fax # 009661 488 7999
To : Mr. Kalpak Gude
Vice President, Regulatory
Associate General Counsel
PanAmSat Corporation- USA
Fax # 001 202 292 4368
Ref. : 12/1731
Date : 21 June, 2006
Sub. : PAS-5

Dear Mr. Gude,

As we have explained to you, Arabsat had initially leased all the Eutelsat satellite EB2 and this satellite has been moved from orbital position 33.0° E to the orbital position at 25.8° E since March 5, 2003, Eutelsat did not have any satellite at this position or at 25.5 degree position prior to Arabsat lease, but as of July 4, 2006, Arabsat will be leasing only six transponders on this Eutelsat satellite EB2. Of course, Arabsat will coordinate with Eutelsat on an operator-to-operator basis to resolve any dispute over the operation of any transponder by ARABSAT to avoid using transponders at 25.8° E that would conflict with (i.e., that would operate on the same frequencies as) the Ku-band transponders that Arabsat will be using on PAS-5 at 26.15° E. We will notify you when the matter with Eutelsat has been resolved, and we understand that any FCC authorization for PanAmSat to operate the PAS-5 Ku-band transponders at 26.15° E that Arabsat will be using will not be effective until this matter has been resolved. And Arabsat will be committed not to activate any carrier on the said transponders without the prior approval of Panamsat..

Kind Regards,

Ahmad Shraidh

Director, Technical Planning & Development