

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

In the Matter of	)	
	)	
Intelsat License LLC	)	
	)	File Nos. SAT-MOD-20110420-00073
Application to Modify Authorization to	)	SAT-STA-20110314-00053
Relocate Galaxy 26 to 50.0° E.L.	)	
	)	Call Sign S2469
Request for Special Temporary Authority for	)	
Galaxy 26	)	

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**RESPONSE OF INTELSAT LICENSE LLC**

Intelsat License LLC (“Intelsat”), by its attorneys, responds to the Comments of New Skies Satellites B.V. (“New Skies”) and the Comments of Al Yah Satellite Communications Company PrJSC (“Yahsat”) regarding the above-referenced application for modification to operate the Galaxy 26 satellite (call sign S2469) at the 50.0° E.L. orbital location. As the Commission is aware, Intelsat is providing U.S. government end-users in theater capacity on Galaxy 26 at this orbital location on a non-interference basis pursuant to a grant of special temporary authority.<sup>1</sup> Yahsat’s comments express concern that Intelsat’s operation of Galaxy 26 at 50.0° E.L. may cause future interference to the Yahsat-1A satellite at 52.25° E.L.<sup>2</sup> New Skies requests that the International Bureau (“the Bureau”) impose conditions to safeguard the rights of

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<sup>1</sup> *Policy Branch Information Actions Taken*, Report No. SAT-00787, DA 11-1068, File No. SAT-STA-20110314-00053 (Jun. 17, 2011) (Public Notice) (“Galaxy 26 STA”).

<sup>2</sup> Comments of Al Yah Satellite Communications Company PrJSC, File Nos. SAT-MOD-20110420-00073 and SAT-STA-20110314-00053 (filed Jun. 6, 2011) (“Comments of Yahsat”).

other satellite operators with superior ITU date priority at the same and nearby orbital locations.<sup>3</sup>

From March 2009 until June 13, 2011, Galaxy 26 was operating at the 50.75° E.L. orbital location. As explained in a June 9, 2011 supplemental letter, the Galaxy 26 satellite is used to provide critical services to U.S. government end-users in theater.<sup>4</sup> On April 22, 2011, Yahsat-1A was launched to 52.5° E.L. On June 13, 2011, pursuant to a grant of special temporary authority, Intelsat commenced the drift to the 50.0° E.L. orbital location.<sup>5</sup> At 50.0° E.L., Galaxy 26 will operate as a U.S.-licensed spacecraft pursuant to the ITU filings of the Turkish Administration.

Yahsat's comments express concern that the operation of Galaxy 26 at 50.0° E.L. nevertheless will cause interference to Yahsat-1A. The proposed modification application seeks authority to continue to operate Galaxy 26 further away from Yahsat-1A and thus better avoid harmful interference into Yahsat-1A. Intelsat has been and continues to be involved in discussions with Yahsat regarding the necessary transmission parameters of the U.S. government end-users served by the Galaxy 26 satellite at 50.0° E.L. and the current and future operations of the Yahsat-1A satellite. Through these negotiations, Intelsat will ensure that operation of Galaxy 26 at 50.0° E.L. does not cause harmful interference to current or future Yahsat-1A operations. Towards this end, and to ensure that Yahsat-1A is protected, Intelsat agrees to operate Galaxy 26 pursuant to grant of this modification application with a condition requiring operation on a non-interference, non-protected basis.

New Skies asks that the Commission place conditions on Intelsat's Galaxy 26 authorization at 50.0° E.L. to protect satellites with higher ITU priority operating at nearby

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<sup>3</sup> Comments of New Skies Satellites B.V., File No. SAT-MOD-20110420-00073 (Jun. 6, 2011) ("Comments of New Skies").

<sup>4</sup> See Letter from Susan H. Crandall to Marlene H. Dortch, File Nos. SAT-STA-20110314-00053 and SAT-MOD-20110420-00073 (filed Jun. 9, 2011).

<sup>5</sup> See Galaxy 26 STA, *supra* note 1.

orbital locations. More precisely, New Skies asks the Commission to (1) impose the two conditions previously imposed on Galaxy 26's operation at 50.75° E.L., (2) clarify that the first condition requiring operation on a non-interference basis applies in ITU Region 1, and (3) impose additional conditions related to operation on a non-interference basis previously imposed on other Intelsat U.S.-licensed satellites operating pursuant to the ITU filings of another administration.<sup>6</sup> Intelsat does not object to the conditions requested by New Skies but notes that several are redundant and all of New Skies' concerns are addressed sufficiently with the existing condition that Intelsat "operate Galaxy 26 on an unprotected and non-harmful interference basis with respect to Broadcasting-Satellite Service (BSS) operations in Regions 1 & 3 in accordance with Article 4.4 of the ITU Radio Regulations."<sup>7</sup>

Respectfully submitted,

Wiley Rein LLP

By: /s/ Jennifer D. Hindin

Jennifer D. Hindin  
Colleen King  
Wiley Rein LLP  
1776 K Street NW  
Washington, DC 20006  
TEL: 202.719.7000  
FAX: 202.719.7049

*Counsel for Intelsat License LLC*

Dated: June 21, 2011

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<sup>6</sup> Comments of New Skies at 5, notes 14 and 15.

<sup>7</sup> Galaxy 26 STA, *supra* note 1, at Condition 6.a.

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 21st day of June, 2011, a copy of the foregoing Response to

Comments of Intelsat License LLC was served by U.S. first-class mail upon:

Joslyn Read  
Vice President, Regulatory Affairs  
New Skies Satellites B.V.  
1129 20<sup>TH</sup> St., NW, Suite 1000  
Washington, DC 20036

Karis A. Hastings  
Hogan Lovells US LLP  
555 13<sup>th</sup> Street, N.W.  
Washington, DC 20004-1109  
*Counsel for New Skies Satellites B.V.*

John P. Janka  
Jarrett S. Taubman  
LATHAM & WATKINS LLP  
555 11<sup>th</sup> St., NW, Suite 1000  
Washington, DC 20004  
*Counsel to Al Yah Satellite Communications Company PrJSC*

Robert Nelson\*  
Karl Kensinger\*  
Kathryn Medley\*  
Stephen Duall\*  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

\* (via electronic mail)

/s/ Kim Riddick  
Kim Riddick