

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

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In the Matter of

TELENOR SATELLITE, INC. )  
Satellite Engineering Branch )  
International Bureau )

Application to Modify Earth Station Authority )  
In the Domestic Fixed-Satellite Service )

File No. SES-MOD-20020919-01633  
KA313

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS OF PANAMSAT CORPORATION**

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby comments on the above-referenced modification application ("Application") of Telenor Satellite, Inc. ("Telenor" or "Applicant"). For reasons that are discussed below, it is not possible to evaluate properly, based on the information that Telenor has provided, whether Telenor's proposed operations could interfere with adjacent PanAmSat satellites. The Commission, therefore, should require Telenor to clarify matters, and should give PanAmSat an additional opportunity to comment, before acting on Telenor's application.

**DISCUSSION**

Among other things, Telenor is seeking to add ALSAT as a point of communication and to use additional emissions. It is unclear, however, which emissions are associated with ALSAT and which are associated with Inmarsat satellites. As a result, one cannot determine which C-band emissions, if any, Telenor is proposing to use to communicate with Inmarsat 2 at 98 W.L., which is one degree from PanAmSat's Galaxy VI at 99 W.L. and three degrees from PanAmSat's Galaxy III-C at 95 W.L. PanAmSat operates C-band payloads on both satellites.

Telenor's proposed C-band transmissions include TT&C and non-TT&C carriers. If Telenor intends to operate non-TT&C C-band carriers at 98 W.L., it is a virtual certainty that those carriers will interfere with PanAmSat's adjacent satellite operations. Even if Telenor's C-band plans at 98 W.L. were limited to TT&C transmissions, moreover, at a minimum those transmissions would have to be coordinated with PanAmSat to avoid objectionable interference. Accordingly, Telenor should be required to revise its applications to provide information clearly identifying the relevant carriers and associated satellites. Based on the additional information Telenor provides, it may be necessary to condition any grant on successful coordination with PanAmSat.

#### CONCLUSION

For the foregoing reasons, the Commission should require Telenor to clarify what it is requesting, and give PanAmSat an additional opportunity to comment, prior to action on the Application.

Respectfully submitted,

PANAMSAT CORPORATION

By: \_\_\_\_\_

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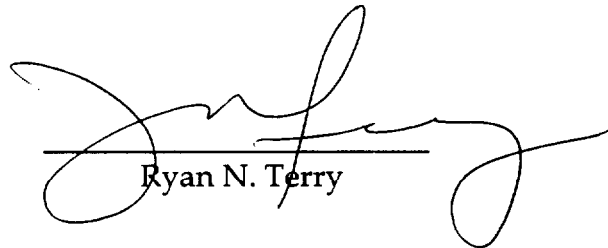
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Its Attorneys

November 1, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent by first-class mail, postage prepaid, this 1st day of November, 2002, to the following:

Telenor Satellite, Inc.  
Attention: Bruce A Henoch  
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Ryan N. Terry