

December 8, 2010

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



Re: Hagerstown, Maryland Earth Station Modification Applications
File Nos. SES-MOD-20090609-00714; SES-MOD-20090609-
00715; SES-MOD-20090609-00716; SES-MOD-20090609-
00717; and SES-MOD-20090609-00718

Dear Ms. Dortch:

Intelsat LLC ("Intelsat") files this letter to further supplement the above referenced applications seeking a waiver of Section 2.106 of the FCC's rules, Footnote NG169 to the U.S. Table of Frequency Allocations to allow five of Intelsat's Hagerstown, Maryland earth stations (call signs E030082, E030071, E030101, E030103, and E030100) to operate in the 3650-3700 MHz frequency band on a co-primary basis with terrestrial fixed services within a 90 km exclusion zone located entirely within an existing grandfathered zone. Specifically, Intelsat provides additional information below about the reason Intelsat seeks to operate with a smaller exclusion zone around these five Hagerstown antennas. In addition, Intelsat clarifies that it would agree to accept a time limit to the waivers, if granted.

Intelsat currently holds licenses for seven grandfathered C-band antennas at its Clarksburg, Maryland teleport. Intelsat leases the 35 acres upon which the Clarksburg teleport sits (the "Clarksburg Property"). The Clarksburg Property has never been owned by Intelsat; indeed, it was leased by Comsat World Systems prior to Intelsat's acquisition of that company in 2002. On September 30, 2013, Intelsat's lease for the Clarksburg property will expire, despite Intelsat's efforts to extend the lease. Intelsat will therefore be closing down its Clarksburg teleport over the next 24 months. As such, commencing January 2011 Intelsat will be relocating services currently on the Clarksburg antennas to antennas at its Mountainside teleport in Hagerstown, including the five antennas listed above. Intelsat's decision to move operations from Clarksburg to Hagerstown was made solely as a result of Intelsat's inability to reach agreement with the owner of the Clarksburg Property; but for the impending expiration of its lease for the Clarksburg Property, Intelsat would continue to operate the grandfathered antennas at its Clarksburg teleport.

In addition, as previously communicated to International Bureau staff, Intelsat would agree to a condition in an order granting these applications that would

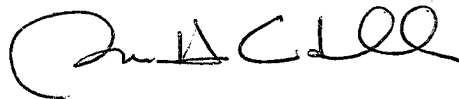
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limit the length of grandfathered status for the above referenced antennas to the end of the life of the last of the Intelsat satellites currently in orbit that have the frequency band 3650-3700 MHz. That date currently is estimated to be late 2025.

For the reasons set forth in the applications and this supplemental letter, Intelsat respectfully requests that the applications be granted.

Please direct any further questions regarding these applications to the undersigned at (202) 944-7848.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Paul Blais
Fern Jarmulnek
Karl Kensinger
Kathryn Medley
Frank Peace
Ira Keltz
Bruce Romano
Ron Repasi
Jamison Prime
Stephen Buenzow