

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of

Constellation, LLC, Carlyle PanAmSat I,
LLC, Carlyle PanAmSat II, LLC, PEP
PAS, LLC, and PEOP PAS, LLC,
Transferors,

and

Intelsat Holdings, Ltd.,
Transferee,

Consolidated Application for Authority to
Transfer Control of PanAmSat Licensee
Corp. and PanAmSat H-2 Licensee Corp.

IB Docket No. 05-290

DA No. 05-2715

File Nos. SAT-T/C-20050930-00193
SAT-T/C-20050930-00194
SAT-T/C-20050930-01356
SAT-T/C-20050930-01357
SAT-T/C-20050930-01371

COMMENTS OF HUGHES NETWORK SYSTEMS, LLC

Hughes Network Systems, LLC (“HNS”) files these comments in response to the Federal Communications Commission’s (“Commission”) public notice regarding the above referenced application (“Application”).¹ HNS supports the acquisition of PanAmSat Holding Corporation (“PanAmSat”) by Intelsat Holdings, Ltd. (“Intelsat”) for the reasons set forth below.

¹ *Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Seek FCC Consent to Transfer Control of Licenses and Authorizations Held by PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Public Notice, IB Docket No. 05-290, DA 05-2715 (Oct. 14, 2005).

I. BACKGROUND

HNS is the world's leading provider of broadband satellite network solutions for businesses and consumers, with more than 800,000 systems ordered or shipped to customers in 85 countries. HNS offers complete turnkey solutions, including program management, installation, training, maintenance and support – for professional and rapid deployment anywhere, worldwide. The company has continuously expanded its international presence, operating facilities and/or sales offices in many countries, including the United Kingdom, Germany, Czech Republic, Italy, Russia, Brazil, Mexico, China, Indonesia, the United Arab Emirates, and India.

HNS pioneered the development of high-speed satellite Internet access services and IP-based networks, which it markets globally under the DIRECWAY® brand. Besides supplying dedicated networks to customers and service providers worldwide, HNS owns and operates a global base of DIRECWAY shared hub services throughout the United States, Brazil, China, Europe, and India. Customers of DIRECWAY shared hub services can realize the many benefits of broadband by satellite – without having to build and operate their own dedicated hubs.

II. THE MERGER IS IN THE PUBLIC INTEREST

HNS, which purchases satellite capacity from both Intelsat and PanAmSat, believes that the merger of these two companies will serve the public interest because it will further the development of broadband services provided by satellite. As Intelsat and PanAmSat correctly point out in the Application, increasing the country's broadband

access, and encouraging intermodal competition in broadband, are among the top priorities of the Administration and the Commission.²

HNS, as a supplier of satellite broadband services, is keenly interested in the continued development of satellite broadband as a competitor to cable modem and DSL services. Such continued development will be furthered by strong satellite operators that have the scale, expertise and resources required to pursue new services and technological advances. While HNS today provides a cost-effective broadband solution, the costs of satellite broadband can only be reduced by companies that are large enough to make meaningful investments in this area. The combined Intelsat/PanAmSat entity will be such a company.

HNS will also benefit as a customer of the combined company, by receiving better customer service in a “one-stop shopping” environment. This, in turn, will inure to the benefit of end-user customers, who will be able to choose among a variety of technologies to meet their high-speed Internet access needs. The availability of broadband via satellite will be especially important for those consumers in rural America and less developed countries, for which broadband via terrestrial means may not be an option.

² See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control, IB Docket No. 05-290 (filed Sept. 30, 2005) at 20.

CERTIFICATE OF SERVICE

I, **Joslyn Read**, do hereby certify that on this 11th day of November, 2005, I sent, via electronic mail, a true and correct copy of the foregoing Comments of Hughes Network Systems, LLC to the following:

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