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**Laurence D. Atlas**  
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November 14, 2005

Donald Abelson  
Bureau Chief  
International Bureau  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

Re: PanAmSat and Intelsat Request for FCC Consent to Transfer Control of Licenses and Authorizations Held by PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp. to Intelsat Holdings, Ltd. - IB Docket No. 05-290

Dear Mr. Abelson:

Loral Space & Communications, Ltd. (Debtor in Possession or "DIP") ("Loral")<sup>1</sup> files this letter in support of the above-referenced transaction. Loral believes that the transaction is in the public interest and that the transaction will not diminish Loral's opportunity to re-enter the U.S. fixed satellite services business.

Loral, through its wholly owned subsidiary Space Systems/Loral, Inc. (DIP), engages in the design and manufacture of satellites and satellite systems for commercial and government applications including satellite services, television broadcasting, direct-to-home television, broadband communications, military communications, wireless telephony, digital satellite radio, weather monitoring, and air traffic management. In addition, Loral, through its various subsidiaries and affiliates, holds numerous FCC licenses, including space station and earth station authorizations.

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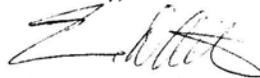
<sup>1</sup> On July 15, 2003, Loral and certain of its affiliates commenced with the United States Bankruptcy Court for the Southern District of New York ("Bankruptcy Court") voluntary cases under Chapter 11 of Title 11 of the United States Code. On September 30, 2005, the Commission granted Loral approval to transfer control of the space and earth station licenses held by certain of its subsidiaries to Loral Space & Communications, Inc. to permit Loral and its subsidiaries to emerge from bankruptcy. Applications of Loral Space & Communications Ltd. (DIP) for the Transfer of Control of Licenses and Authorizations Held by Loral Orion, Inc. (DIP), Loral SpaceCom Corporation (DIP) and Loral Skynet Network Services, Inc. (DIP) to Loral Space & Communications Inc., Public Notice, DA 05-2639 (rel. Sept. 30, 2005).

It currently operates a fleet of international satellites that provide satellite capacity and platforms for use by television and cable networks to deliver video programming, and by communications service providers, resellers, corporate and government customers for international broadband data transmission, internet services and other value-added communications services.

Pursuant to an Asset Purchase Agreement dated as of July 15, 2003, Loral agreed to assign its domestic satellite authorizations to Intelsat North America LLC. The FCC space station authorizations for Telstar 6 at 93° W.L. and Telstar 7 at 129° W.L., held by Loral Satellite, Inc. (DIP), and Telstar 4 at 89° W.L., Telstar 5 at 97° W.L., and Telstar 8 to be located at 89° W.L., held by Loral SpaceCom Corporation (DIP), were assigned to Intelsat North America LLC, consistent with Bankruptcy Court and Commission approval.<sup>2</sup> Telstar 13 (C-band capacity at 121° W.L. on the satellite also known as EchoStar 9), authorized by the Administration of Papua New Guinea, was also assigned to Intelsat.

In connection with the Intelsat transaction, Loral is contractually precluded from offering fixed satellite services in the U.S. until March, 2006. Loral has begun an examination of the opportunities it has to re-enter the U.S. market when the non-compete provision in the Intelsat agreement expires. Based on the publicly available materials provided to the Commission by the merger proponents and on the current state of demand for fixed satellite services, Loral does not believe that the proposed transaction diminishes Loral's opportunity to re-enter the U.S. domestic satellite services business.

Sincerely,



Laurence D. Atlas

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<sup>2</sup> In the Matter of Loral Satellite, Inc. (Debtor-in-Possession) and Loral SpaceCom Corporation (Debtor-in-Possession), Assignors and Intelsat North America, LLC, Assignee; Applications for Consent to Assignments of Space Station Authorizations and Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934, as Amended, Order and Authorization, 19 FCC Rcd. 2404 (2004).