



Julie A. Reese
Deputy Director General
& General Counsel

Direct telephone: +1-202-243-5093
Email: jreese@itso.int

24 April 2006

Marlene H. Dortch, Secretary
U.S. Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Letter
IB Docket No. 05-290 (PanAmSat Transfer)

Dear Ms. Dortch:

Please find attached a letter from Mr. Ahmed Toumi, ITSO's Director General and CEO, sent today to FCC Chairman Kevin J. Martin, regarding the "Reply Comments of Intelsat" as filed on April 13, 2006 in the FCC's proceeding seeking comments for its Report to Congress on the ORBIT Act, IB Docket 06-61. These Reply Comments also were filed by Intelsat as a written *ex parte* presentation to IB Docket No. 05-290 on April 13, 2006.

The attached letter addresses certain elements of the Reply Comments of Intelsat in IB Docket 06-61.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Reese". The signature is written in a cursive style with a large, looping initial "J".

Attachment: ITSO's 24 April 2006 letter to
FCC Chairman Kevin J. Martin

CERTIFICATE OF SERVICE

I, Julie A. Reese, do hereby certify that on this 24th day of April 2006, I sent, via electronic mail, a true and correct copy of the foregoing Ex Parte letter filed by the International Telecommunications Satellite Organization to the following:

Phillip Spector
Executive Vice President and
General Counsel
Intelsat Holdings, Ltd.
Wellesley House North, 2nd floor
90 Pitts Bay Road
Bermuda
phil.spector@intelsat.com

Diane J. Cornell
Vice President, Government Affairs
INMARSAT, Inc.
100 Wilson Blvd.
Suite 1425
Arlington, VA
diane_cornell@inmarsat.com

Ambassador David A. Gross
U.S. Coordinator, International
Communications & Information Policy
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520
grossda@state.gov

Jennifer A. Manner
Vice President, Regulatory Affairs
Mobile Satellite Ventures Subsidiary LLC
10802 Parkridge Blvd.
Reston, VA 20191
jmanner@msvlp.com

Steven W. Lett
Deputy U.S. Coordinator, International
Communications & Information Policy
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520
lettsw@state.gov

John P. Janka
Jeffrey A. Marks
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
Counsel for Inmarsat, Inc.
john.janka@lw.com

Bruce D. Jacobs
David S. Konczal
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1128
Counsel for Mobile Satellite Ventures Subsidiary LLC
bruce.jacobs@pillsburylaw.com

James Ball, Chief
Policy Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
James.Ball@fcc.gov

JoAnn Lucanik, Associate Division Chief
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
JoAnn.Lucanik@fcc.gov


Julie A. Reese
Deputy Director General & General Counsel
International Telecommunications Satellite
Organization
3400 International Dr, N.W.
Washington, D.C. 20008

Ahmed Toumi
Director General and
Chief Executive Officer

Direct telephone: +1-202-243-5092
Email: atoumi@itso.int
Ref:04-24-06/DG-35

24 April 2006

The Honorable Kevin J. Martin
Chairman
U.S. Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Martin:

This letter is written in regard to the FCC's proceeding seeking comments for its Report to Congress on the ORBIT Act, IB Docket 06-61. ITSO submitted Comments to this proceeding on March 30, 2006, and had not intended to submit Reply Comments or further information. However, based on Reply Comments filed by Intelsat on April 13, 2006, ITSO would like to provide these additional comments to correct certain mistaken messages.

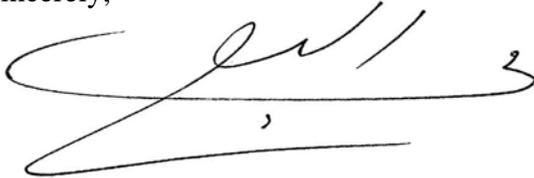
Intelsat's characterization of the "Public Services Agreement" between Intelsat and ITSO as merely a "private contract" trivializes the decisions of ITSO's 148 sovereign member States to privatize INTELSAT, as reflected in the corresponding international agreements. It appears to be an attempt to separate the U.S. objectives embodied in the Orbit Act from the ITSO treaty Agreement, to which the United States is not only a party but is also the selected jurisdiction ("Notifying Administration") for the Parties' Common Heritage orbital locations and associated radio frequency spectrum. Additionally, Intelsat's characterization omits the fact that the Public Services Agreement clearly states that Intelsat's continuous performance of its public service obligations is the "consideration" for the transfer to Intelsat of the intergovernmental organization's assets, as well as the privatization decisions that provide the basis for the Parties' authorization for Intelsat's use of the Common Heritage orbital locations and associated radio frequency spectrum.

FCC Chairman Kevin J. Martin
24 April 2006
Page 2

As previously noted in ITSO's filing with the Commission, since 2005 Intelsat has not fulfilled its public service obligations and, in the framework of its proposed merger with PanAmSat, Intelsat has not implemented the necessary steps to secure the continuity of these obligations in case of a bankruptcy procedure. Therefore, ITSO would like to take this opportunity to renew its appeal to the Commission to protect the public service obligations of Intelsat, as well as the Common Heritage orbital locations and associated radio frequency spectrum, as envisioned in the ITSO treaty Agreement.

Please accept, Mr. Martin, my highest consideration and best regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ahmed Toumi', with a long horizontal flourish extending to the right.

Ahmed Toumi
Director General &
Chief Executive Officer

cc: Honorable Jonathan S. Adelstein – Commissioner
Honorable Michael J. Copps - Commissioner
Honorable Deborah Taylor Tate - Commissioner
Ambassador David A. Gross, U.S. Department of State