

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

In re:)
)
Report to Congress Regarding the) IB Docket No. 07-50
Orbit Act)

COMMENTS OF INTELSAT

Intelsat LLC and its affiliated entities (collectively, "Intelsat") hereby respond to the Federal Communications Commission's ("FCC" or "Commission") request for comments in the above referenced proceeding.¹ The Commission seeks comments in order to compile its eighth report to Congress pursuant to Section 646 of the Open-Market Reorganization for the Betterment of International Telecommunications Act ("ORBIT Act" or "Act").²

Intelsat continues to respond to market forces in a competitive environment. Since Intelsat last filed comments in March 2006, it has completed its acquisition of PanAmSat Holding Corporation ("PanAmSat").³ The acquisition of PanAmSat has allowed Intelsat to offer expanded communications services, thus increasing competition in the market. This, in turn, benefits consumers, who have more choices available to them at more competitive prices.

¹ *International Bureau Information: Report to Congress Regarding the ORBIT Act*, Report No. SPB-218 (Mar. 22, 2007) (Public Notice).

² *Open-Market Reorganization for the Betterment of International Telecommunications Act*, Pub. L. 106-180, 114 Stat. 48 (2000), *as amended*, Pub. L. No. 107-233, 116 Stat. 1480 (2002), *as amended*, Pub. L. No. 108-228, 118 Stat. 644 (2004), *as amended*, Pub. L. No. 108-371, 118 Stat. 1752 (2004).

³ *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 of PanAmSat Licensee Corp., and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 7368 (2006).

Intelsat's privatization thus continues to have a positive impact on the global marketplace for communications services. Intelsat – with its fleet of 51 satellites – is a leader in the digital delivery of video content, the transmission of corporate data and the provisioning of government communications solutions.

Intelsat remains subject to intense competition in the market for communications services – from other providers of satellite services, as well as from terrestrial sources, such as fiber optic cable, broadband-enabled IP applications and terrestrial wireless platforms. New entrants continue to emerge to provide additional competition. For example, Kazakhstan last year launched its first satellite, designed to provide communications services to that country, as well as to Russia, Uzbekistan, Kyrgyzstan and Turkmenistan.⁴ Also, last year Loral Skynet resumed offering fixed satellite services in North America after a two-year absence.⁵ Intelsat has responded, and will continue to respond, to these competitive market forces.

Respectfully submitted,

Intelsat LLC

By: /s/ Jennifer D. Hindin

Bert W. Rein

Jennifer D. Hindin

Wiley Rein LLP

1776 K Street, N.W.

Washington, DC 20006-2304

202.719.7000

Its Attorneys

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⁴ “Kazakhstan satellite enters orbit”, USA Today, June 18, 2006, *available at* http://www.usatoday.com/news/world/2006-06-18-kazakhstan-satellite_x.htm (last visited Apr. 6, 2007).

⁵ “Loral Skynet Re-enters U.S. and North American Fixed Satellite Services Market”, Loral Skynet Press Release, Mar. 22, 2006, *available at* <http://www.spaceref.com/news/viewpr.html?pid=19329> (last visited Apr. 6, 2007).