



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

January 17, 2013

Via E-mail

Mr. Michel G. Cayouette  
Chief Financial Officer  
Telesat Canada  
1601 Telesat Court  
Ottawa, Ontario, Canada K1B 5P4

**Re: Telesat Canada  
Form 20-F for Fiscal Year Ended December 31, 2011  
Filed February 22, 2012  
File No. 333-159793**

**Telesat Holdings Inc.  
Form 20-F/A for Fiscal Year Ended December 31, 2011  
Filed January 14, 2013  
File No. 333-159793-01**

Dear Mr. Cayouette:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terry French for

Larry Spigel  
Assistant Director