

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

DIVISION OF CORPORATION FINANCE

October 19, 2010

Mr. Christopher S. DiFrancesco Vice-President, General Counsel and Secretary Telesat Canada 1601 Telesat Court Ottawa, Ontario, Canada K1B 5P4

> Re: Telesat Canada Form 20-F for the fiscal year ended December 31, 2009 Filed March 3, 2010 File No. 333-159793

Dear Mr. DiFrancesco:

We have completed our review of your Form 20-F and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spirgel Assistant Director