

Exhibit 1

This application is one of several simultaneously filed applications seeking Federal Communications Commission (“FCC” or “Commission”) consent to the non-substantial or *pro forma* transfer of control of all of the licenses (collectively, the “Intelsat Licenses”) held by Intelsat License LLC and Horizons-3 License LLC (collectively, the “Intelsat Licensees”). By the instant application, Intelsat License LLC and Intelsat S.A. seek consent to the non-substantial or *pro forma* transfer of control of Intelsat License LLC’s experimental license (call sign WI2XYV) pursuant to section 5.79(a) of the FCC’s rules.¹

Under the FCC’s rules, transfers of control that do not result in a change of the actual controlling party are considered non-substantial or *pro forma*.² Moreover, a “corporate reorganization that involves no substantial change in the beneficial ownership of the corporation” is presumptively considered to be non-substantial or *pro forma*.³ The corporate changes described below involve the insertion into the ownership chain of new holding companies, including a new limited partnership, and the conversion of certain entities from corporations to limited liability companies (“LLCs”). These corporate changes constitute non-substantial (*pro forma*) transfers of control because ultimate ownership and control of the Intelsat Licensees is exactly the same before and after the corporate reorganizations.

Description of the Pro Forma Transfer of Control

A. Currently Approved Ownership Structure

The FCC currently has approved the ownership and control of the Intelsat Licenses through various wholly owned subsidiaries of Intelsat S.A as depicted in Exhibit 2-A (Intelsat Licensees Currently Approved Ownership).⁴ The equity interests in Intelsat S.A. are currently held by Serafina S.A. (approximately 48 percent), public shareholders including members of Intelsat management (approximately 42 percent), and SLP III Investment Holding S.à r.l. (approximately 10 percent).⁵

B. Post-Consummation Ownership Structure

The Intelsat Licensees seek FCC consent for the non-substantial or *pro forma* transfer of control of the Intelsat Licenses as part of corporate reorganizations involving the insertion into

¹ 47 C.F.R. § 5.79(a).

² 47 C.F.R. § 63.24(d) (“Transfers of control or assignments that do not result in a change in the actual controlling party are considered non-substantial or *pro forma*.”).

³ 47 C.F.R. § 63.24(d), Note 2.

⁴ See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”); See *Intelsat Global Holdings, S.A. Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, IB Docket No. 11-205, Order, 27 FCC Rcd 5226 (2012) (“*2012 Intelsat Transfer Application Grant*”).

⁵ See also Letter from Jennifer D. Hindin, Wiley Rein to Marlene H. Dortch, FCC, IB Docket No. 11-205 (filed June 14, 2018).

the ownership chain of new holding companies, including a new limited partnership, and the conversion of certain corporations to LLCs, none of which change ultimate ownership of the Intelsat Licensees. The post-consummation ownership structure is depicted in Exhibit 2-B (Intelsat Licensees Ownership Following *Pro Forma* Changes), and described below.

- Intelsat Alliance LP, a limited partnership, is inserted into the ownership chain.
- Above Intelsat Alliance LP, Intelsat Envision Holdings LLC, Intelsat Connect Finance S.A., Intelsat Genesis Inc., and Intelsat Genesis GP LLC, are inserted into the ownership chain.
- Below Intelsat Alliance LP, Intelsat Corporation converts into Intelsat US LLC, and Intelsat General Corporation converts into Intelsat General Communications LLC, both Delaware limited liability companies.

II. Public Interest Statement – Response to Question A.21

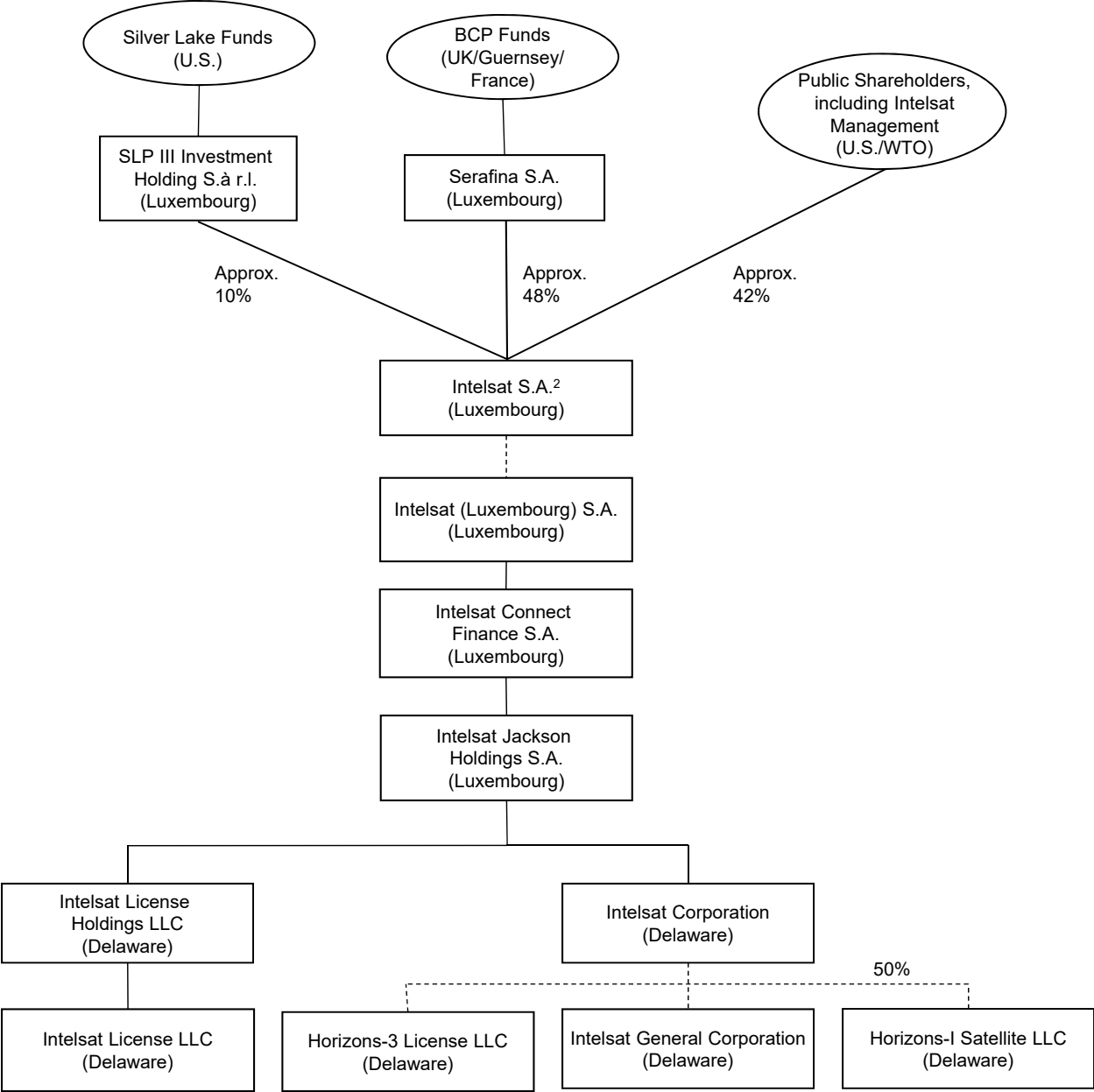
These internal corporate reorganizations serve the public interest by creating operational and administrative efficiencies for the Intelsat Licensees. The FCC routinely finds that similar corporate changes serve the public interest.⁶

These corporate changes constitute non-substantial (*pro forma*) transfers of control because ultimate control of the Intelsat Licensees is exactly the same before and after the corporate reorganizations. In addition, the Intelsat Licensees are qualified to remain Commission licensees. The FCC previously has approved *pro forma* transfers of control of the Intelsat Licensees that were effectuated through a corporate reorganization.⁷ These corporate reorganizations are similar types of non-substantial changes to the ownership structure of the Intelsat Licensees.

⁶ See, e.g. *Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009) (“2009 Intelsat Transfer Application Grant”); *Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control*, File Nos. SES-ASG-20101203-01501, SES-ASG-20101206-01502, SES-T/C-20101203-01503, SES-ASG-20101203-01504, SES-ASG-20101206-01512, SAT-ASG-20101203-00251, SAT-ASG-20101203-00252, SAT-T/C-20101203-00253, SAT-T/C-20101203-00254 (granted Dec. 20, 2010, Dec. 21, 2010 and Dec. 23, 2010).

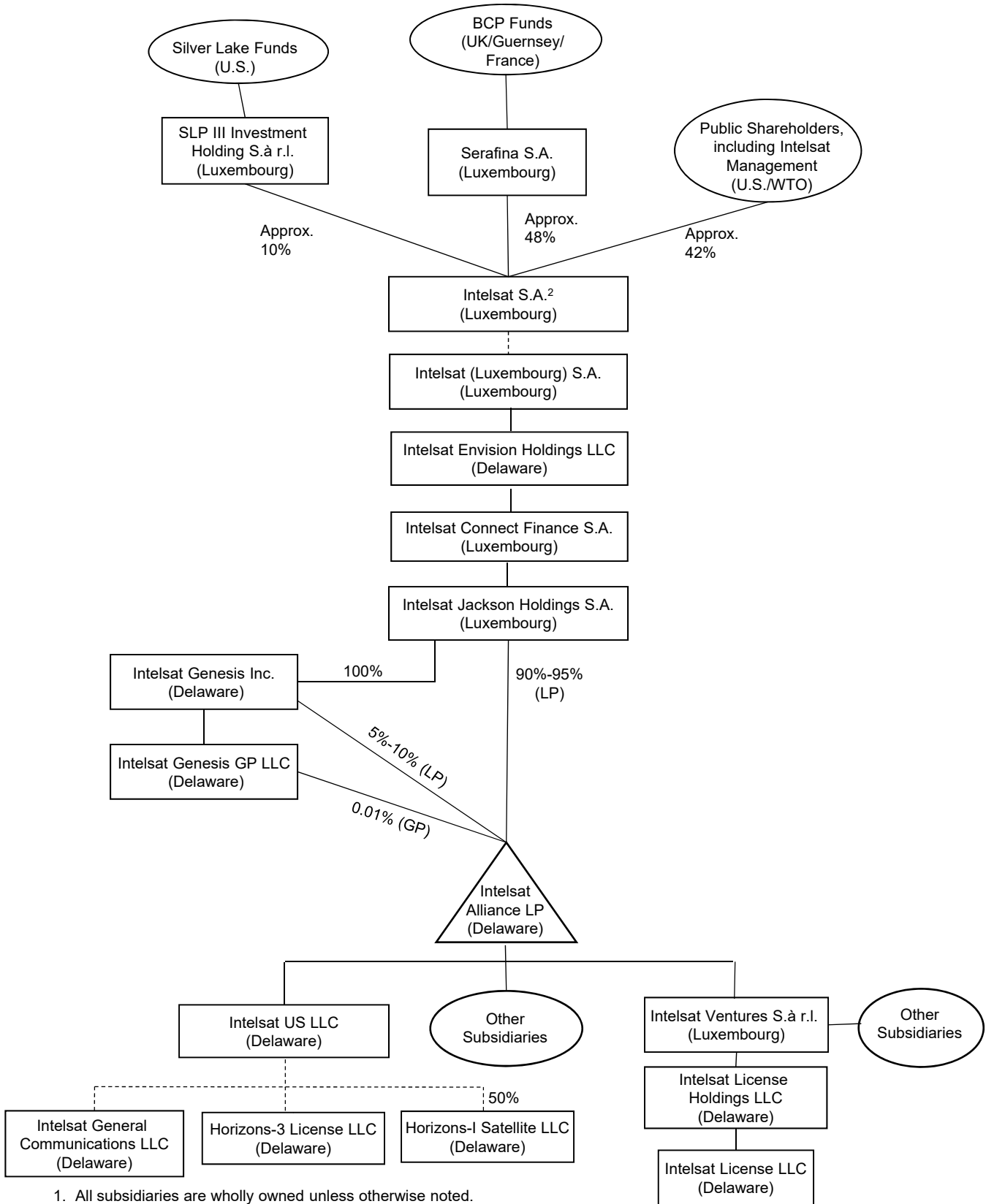
⁷ See *id.*

Exhibit 2-A:
Intelsat Licensees Currently Approved Ownership¹



1. All subsidiaries are wholly owned unless otherwise noted.
 2. Dotted lines reflect intermediate subsidiaries not shown.

Exhibit 2-B:
Intelsat Licensees Ownership Following Pro Forma Changes ¹



1. All subsidiaries are wholly owned unless otherwise noted.
 2. Dotted lines reflect intermediate subsidiaries not shown.