

October 1, 2012

VIA ELECTRONIC FILING

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

Re: Intelsat License LLC Request for Confidential Treatment;
ELS File No. 0512-EX-PL-2012

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), through its attorneys, hereby requests that certain U.S. Government contact information provided pursuant to the above-referenced application for an experimental license be given confidential treatment and withheld from public inspection pursuant to Section 0.459 of the Commission’s Rules, 47 C.F.R. § 0.459.

Pursuant to the Freedom of Information Act (“FOIA”), public disclosure is not required for “trade secrets, commercial or financial information obtained from a person and privileged and confidential.”¹ The information provided pursuant to the above-referenced application falls within this exemption from public disclosure and other important factors support confidential treatment.

Pursuant to Section 0.459(b) of the Commission’s Rules, 47 C.F.R. § 0.459(b), the following information is provided in support of the request for confidential treatment. The information for which confidential treatment is requested is contained in an exhibit to Intelsat’s experimental license application (File No. 0512-EX-PL-2012), titled “Narrative Description and Public Interest Statement.”²

¹ 5 U.S.C. § 552(b)(4); *see also* 47 C.F.R. § 0.457(d).

² *See* 47 C.F.R. § 0.459(b)(1), (2).

Intelsat has received specific requests from U.S. Government and military personnel that this information be treated as privileged and confidential.³ The market for such government contracts is highly competitive.⁴ Release of this information could harm Intelsat by revealing specific points of contact in existing and potential government contract procurements and by failing to respect the request for confidentiality from the contacts themselves.⁵ In addition, failure to maintain confidentiality of the underlying information could adversely affect important U.S. Government military and national security interests.

Intelsat has protected and will continue to protect this information as proprietary. These contacts and associated information have only been divulged within Intelsat to personnel with a direct need to know, and it has not been disclosed to outside consultants unless privilege attaches and confidentiality is agreed.⁶ Intelsat has not disclosed the information to third parties and understands that this information is not publicly available.⁷ Intelsat requests that the subject information not be made routinely available for public inspection at any time.⁸

Finally, the public interest will be served by the granting of this request for confidential treatment. It is in the public interest that licensees providing services pursuant to government contracts, particularly in support of military and other national security missions, have the ability to keep related information confidential and respect the requests for confidentiality of their government customers. If the Commission denies this request for confidential treatment, Intelsat will withdraw the exhibit described herein.

Respectfully submitted,

/s/ Carlos M. Nalda

Carlos M. Nalda
Counsel to Intelsat License LLC

³ See 47 C.F.R. § 0.459(b)(3).

⁴ See 47 C.F.R. § 0.459(b)(4).

⁵ See 47 C.F.R. § 0.459(b)(5).

⁶ See 47 C.F.R. § 0.459(b)(6).

⁷ See 47 C.F.R. § 0.459(b)(7).

⁸ See 47 C.F.R. § 0.459(b)(8).