



**U.S. Department of Justice**

National Security Division

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*Assistant Attorney General*

*Washington, D.C. 20530*

March 24, 2016

*By E-File*

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th St. SW, Room TW-B204  
Washington, DC 20554

**Re: Request to Modify International 214 Authorizations for Airbus DS Satcom Government, Inc. (ITC-MOD-20151009-00235)**

Dear Ms. Dortch:

The Department of Justice (DOJ), including the Federal Bureau of Investigation (FBI), with the concurrence of the Department of Homeland Security (DHS)(collectively, the Agencies), respectfully responds to the October 16, 2015, notice from the Federal Communications Commission (FCC) (EB 2015-30) that Airbus DS Satcom Government, Inc., (ASGI) seeks to modify its section 214 authorizations by removing the condition that AGSI comply with its Network Security Agreement (NSA).

ASGI, which is a wholly-owned subsidiary of Airbus Defense and Space, Inc. (“ADSI”), is a party to an NSA dated November 29, 2001, and amended in March 2007, October 2008, and December 2011. The other parties to the NSA are DOJ, DHS, Airbus Group SE (Airbus, a Dutch company formerly known as EADS N.V.); Airbus DS Holding SAS (formerly known as Astrium Holding SAS); Airbus DS SatCom AS (formerly known as Mobsat Holding Norway AS); Airbus DS Systems Holdings, Inc. (ADS, formerly known as Mobsat Holding US Corp.); Astrium Services Business Communications, Inc. (ASBCI, formerly known as Marlink, Inc.); and certain other U.S. subsidiaries of Airbus that are no longer operational.

ADS has filed applications to transfer control of AGSI to Satcom Direct Communications (SDC) – files ITC-T/C-20150804-00192, SES-T/C-20150804-00503, SES-T/C-20150804-00504. Also, on August 6, 2015, ASGI provided a change of control notice pursuant to Section 7.2 of the NSA to the Assistant Attorney General, National Security Division, DOJ, and the Assistant Secretary for Policy, DHS. The notice informed the recipients of the intended sale of ASGI to SDC, a cleared Florida corporation owned and controlled by two U.S. persons; i.e., SDC is 70% owned by the James W. Jensen Living Trust (which is owned and controlled by its trustee, James W. Jensen, a U.S. citizen) and 30% owned by David E. Greenhill, a U.S. citizen.

Accordingly, upon notice from AGSI that the transfer of control to SDC has been consummated and upon final signature of all NSA parties of Amendment No. 4, which reflects the divestiture of ASGI and its removal as a party to the NSA, the Agencies confirm that they have no objection to the removal of the condition that AGSI comply with the commitments of the above-described NSA.

Thank you for your consideration.

Sincerely,

/S/ Richard C. Sofield

Richard C. Sofield

Director, Foreign Investment Review Staff

National Security Division

U.S. Department of Justice

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