

January 11, 2007

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Telenor ASA, Transferor, and Inceptum 1 AS, Transferee, Consolidated Application for Consent to Transfer of Control and Petition for Declaratory Ruling*, IB Dkt No. 06-225, FCC File Nos. ISP-PDR-20061129-00017, ITC-T/C-20061129-00529/00530/00531, ITC-T/C-20061215-00575, SES-T/C-20061129-02062/02063, 0002817301, and 0030-EX-TU-2006 Notification Pursuant to Section 1.65

Dear Ms. Dortch:

Inceptum 1 AS (“Inceptum”) and Telenor ASA (“Telenor”), by their attorneys and pursuant to Section 1.65 of the Commission’s rules, hereby supplement the above-referenced petition for declaratory ruling and consolidated application for Commission consent to the transfer of control of Telenor Satellite Services AS (“TSS”) and its indirect, wholly-owned subsidiaries (the “TSS Subsidiaries”) to Inceptum. Specifically, Inceptum and Telenor hereby advise the Commission of a non-substantive change in the proposed post-closing ownership structure of Inceptum.

The Consolidated Application stated that:

The final ownership structure of TSS and the TSS Subsidiaries will include certain holding companies that have not yet been formed. Specifically, prior to closing, Apax France will set up a holding company organized under the laws of Luxembourg (referred to for present purposes as “Luxembourg Holdco 1”). Luxembourg Holdco 1 will also set up a holding company organized under the laws of Luxembourg (referred to for present purposes as “Luxembourg Holdco 2”). Luxembourg Holdco 2 will own all the shares of Inceptum.¹

¹ Consolidated Application at 9. *See also id.* at 10, describing final ownership structure in which “Luxembourg Holdco 1 will hold 100% of the shares of Luxembourg Holdco 2, which in turn will hold 100% of the shares of Inceptum.”

This planned structure has been modified to replace the second Luxembourg holding company with two holding companies incorporated in the Netherlands. Specifically, the entity referred to in the Consolidated Application as “Luxembourg Holdco 1” will set up a holding company organized under the laws of the Netherlands (“Netherlands Holdco 1”). Netherlands Holdco 1 will in turn set up another holding company organized under the laws of the Netherlands (“Netherlands Holdco 2”). Netherlands Holdco 2 will own all the shares of Inceptum.

An ownership chart reflecting the revised structure is attached hereto, and should be referred to in lieu of the chart appearing on page 10 of the Consolidated Application.

In addition, please substitute the following information in Exhibit 3 of the Consolidated Application in lieu of the entry describing Luxembourg Holdco 2:

Reporting Entity	Country of Organization	Nationality of investment principals, officers, and directors	Location of world headquarters	Location of tangible properties	Location of greatest sales and/or revenues
Netherlands Holdco 1	Netherlands	This entity has not yet been created.	This entity has not yet been created.	N/A	N/A. Holding Company
Netherlands Holdco 2	Netherlands	This entity has not yet been created.	This entity has not yet been created.	N/A	N/A. Holding Company

Similarly, please substitute the following information on page 4 of Attachment 1 to the Section 214 transfer of control applications in lieu of the entry describing Luxembourg Holdco 2:

Name of Beneficial Owner:	Netherlands Holdco 2 (to be formed and named)
Business Type:	Holding Company
Address:	This entity has not yet been created.
Citizenship:	Netherlands
Percentage of Ownership:	100% direct ownership of Inceptum

Name of Beneficial Owner:	Netherlands Holdco 1 (to be formed and named)
Business Type:	Holding Company
Address:	This entity has not yet been created.
Citizenship:	Netherlands
Percentage of Ownership:	100% indirect ownership of Inceptum

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Please address any questions concerning this matter to the undersigned.

Respectfully submitted,

/s/

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Revised Post-Consummation Ownership of TSS and Subsidiaries

