

ATTACHMENT 1
PRO FORMA TRANSFER OF CONTROL OF
INTERNATIONAL SECTION 214 AUTHORITY

Answer to Question 10

Transferor Information (Intelsat Global, Ltd. (Bermuda)):

Susan Crandall
Asst. General Counsel
Intelsat Corporation
3400 International Drive, N.W.
Washington, DC 20008
(202) 944-7847
susan.crandall@intelsat.com

with a copy to counsel:

Jennifer Hindin
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
(202) 719-4975
jhindin@wileyrein.com

Section 63.18(d). Intelsat Global, Ltd. (Bermuda) does not hold any international Section 214 authorizations.

Transferee Information (Intelsat Global, S.A. (Luxembourg)):

Susan Crandall
Asst. General Counsel
Intelsat Corporation
3400 International Drive, N.W.
Washington, DC 20008
(202) 944-7847
susan.crandall@intelsat.com

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jhindin@wileyrein.com

Section 63.18(d). Intelsat Global, S.A. (Luxembourg) does not hold any international Section 214 authority, but does indirectly control Intelsat USA License Corp., which holds the international Section 214 authorizations that are the subject of this notification: ITC-214-20051031-00443 (global facilities-based and global resale services), ITC-MOD-20051007-00445 (global facilities-based and global resale services), ITC-214-19920318-00117, (satellite services between the United States and Cuba), ITC-214-19930829-00248 (satellite services between the United States and Cuba).

Answer to Question 11

The proposed transactions constitute non-substantial (*pro forma*) transfers of control, because ultimate ownership and control of both the transferor and transferee and indirectly of the Section 214 holder, Intelsat USA License Corp., will be exactly the same before and after the proposed transactions. The Commission previously approved each person or entity that directly or indirectly controls at least ten percent of the equity of the transferee, Intelsat Global, S.A. (Luxembourg), in the *Intelsat-Serafina Order*.¹ There have been no material changes to the this ultimate ownership and control since the date of the *Intelsat-Serafina Order*.

Answer to Question 13

Intelsat hereby notifies the Commission of the *pro forma* transfer of control of the international section 214 authority held by Intelsat USA License Corp. from Intelsat Global, Ltd. (Bermuda) to Intelsat Global, S.A. (Luxembourg). As depicted in Exhibit 1, Intelsat USA License Corp. was owned and controlled through various directly and indirectly wholly-owned subsidiaries of Intelsat Global, Ltd., a Bermuda entity. These subsidiaries include the following Bermuda entities, each of which is an indirect parent of Intelsat USA License Corp.: Intelsat Global Subsidiary, Ltd.; Intelsat Holdings, Ltd.; Intelsat, Ltd.; Intelsat (Bermuda), Ltd.; Intelsat Jackson Holdings, Ltd.; Intelsat Intermediate Holding Company, Ltd. and Intelsat Subsidiary Holding Company, Ltd. (together with Intelsat Global, Ltd., the “Bermuda Entities”). Each of these Bermuda Entities was migrated to and reorganized as a Luxembourg entity, becoming respectively: Intelsat Global, S.A.; Intelsat Global Subsidiary, S.A.; Intelsat Holdings, S.A.; Intelsat, S.A.; Intelsat (Luxembourg), S.A.; Intelsat Jackson Holdings, S.A.; Intelsat Intermediate Holding Company, S.A. and Intelsat Subsidiary Holding Company, S.A. (collectively, the “Luxembourg Entities”). In connection with this migration, Intelsat (Bermuda), Ltd. changed its name to Intelsat (Luxembourg), S.A. The migration of the Bermuda Entities effected a *pro forma* transfer of control of the international Section 214 authority held by Intelsat USA License Corp. The migration did not affect the assets held by Intelsat USA License Corp. or its ultimate ownership and control. It was merely a change in corporate form and jurisdiction of organization. The post-consummation holding structure for Intelsat USA License Corp. is illustrated in Exhibit 2.

¹ *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*”).

Exhibit 1

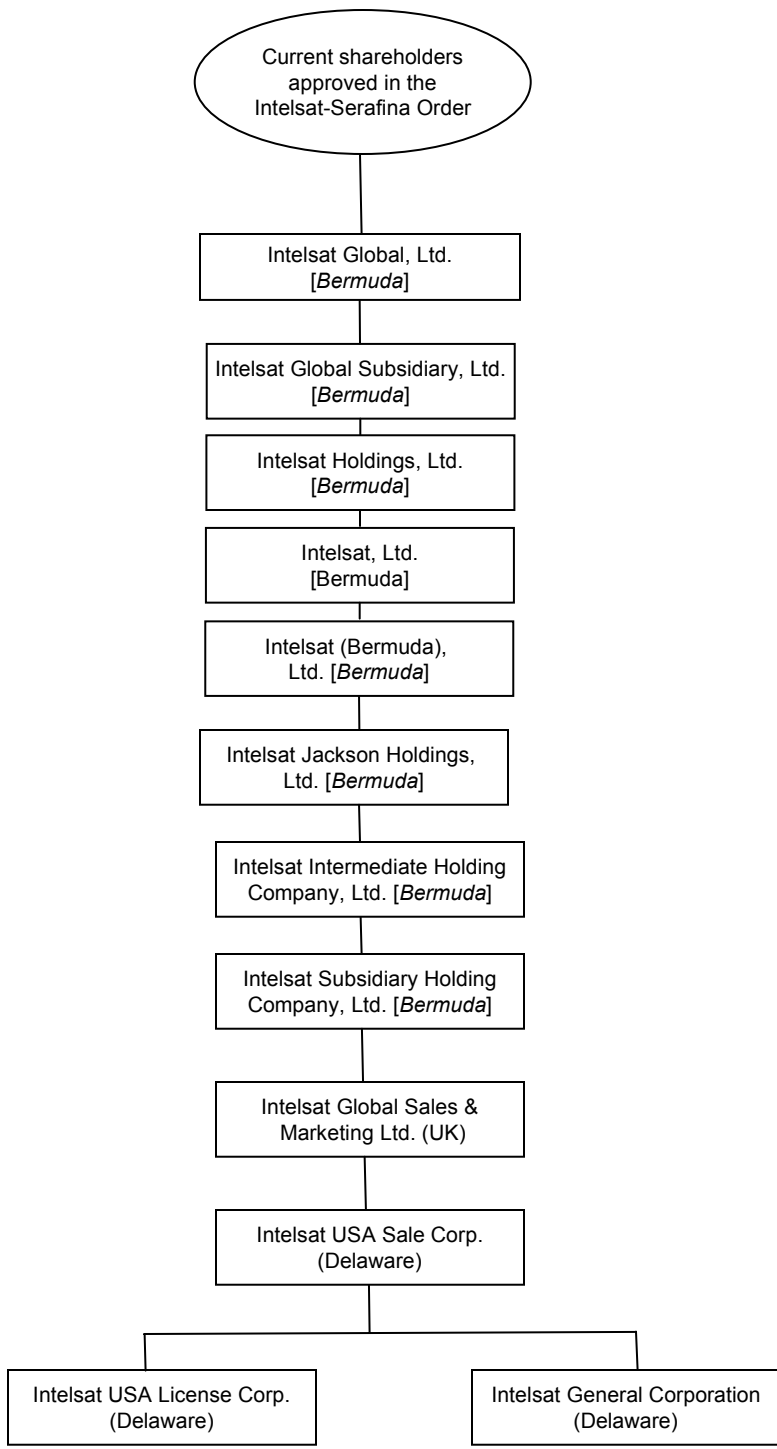


Exhibit 2

