

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Intelsat Global Holdings S.A.)	IB Docket No. 11-205
)	
Application for Consent to Transfer Control)	
of Intelsat Licenses and Authorizations from)	
BC Partners Holdings Limited to Public)	
Ownership)	
)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

The Department of Justice (“DOJ”), with the concurrence of the Department of Homeland Security (“DHS”) (collectively, the “Agencies”), submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.¹ Through this Petition, the Agencies advise the Commission that they have no objection to the Commission approving the authority sought in the above-referenced proceeding, provided that the Commission conditions its approval on the assurance of Intelsat Global Holdings S.A. (“Intelsat”) to abide by the commitments and undertakings contained in its February 14, 2012 letter to the Agencies (the “Letter”), which is attached hereto.

In the above-referenced proceeding, Intelsat has sought Commission approval to transfer control of all of the licenses and authorizations held by Intelsat License LLC, Intelsat New Dawn Company, Ltd., Intelsat USA License LLC and Intelsat General Corporation pursuant to a public

¹ 47 C.F.R. § 1.41.

offering of newly issued voting shares by Intelsat, subsequent voting share sales by current shareholders and possible private placements of newly issued voting shares.

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of Intelsat in connection with the above-referenced proceeding, the Agencies have concluded that the commitments set forth in the Letter will help ensure that the Agencies and other entities with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, the Agencies advise the Commission that they have no objection on those grounds to the Commission granting the applications in the above-referenced proceeding, provided that the Commission conditions its consent on compliance by Intelsat with the commitments set forth in the Letter.

Respectfully submitted,

/s/ Richard C. Sofield

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February 14, 2012