

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat North America LLC

Application for Authority to Operate
Intelsat 25, an In-orbit Satellite, at 31.5°
W.L.

File No. SAT-A/O- _____

**APPLICATION FOR AUTHORITY TO OPERATE INTELSAT 25,
AN IN-ORBIT SATELLITE, AT 31.5° W.L.**

Intelsat North America LLC (“Intelsat”), pursuant to Sections 25.114 and 25.165(e) of the Federal Communications Commission’s (“FCC” or “Commission”) rules, hereby applies for authority to operate a non-common carrier C- and Ku-band satellite, to be known as Intelsat 25, at the 31.5° W.L. orbital location. Intelsat 25 is an in-orbit satellite recently acquired by Intelsat in the ProtoStar Ltd. (“ProtoStar”) bankruptcy proceeding.¹ Intelsat expects to have the satellite on station at 31.5° W.L. in mid-March 2010.² This orbital location currently is occupied by Intelsat 801.³

¹ This request is being submitted as an application for operating authority because the Intelsat 25 satellite already is in orbit. See *DirectTV Enterprises, LLC, Application for Authorization to Operate DIRECTV 5 at the 109.8° W.L. Orbital Location*, Order and Authorization, 20 FCC Rcd 15778, ¶ 5 n.10 (2005) (“[t]ypically, a replacement satellite is a newly-build satellite for which the applicant seeks authority to launch and operate”).

² Intelsat expects to begin drifting the satellite to 31.5° W.L. in early January under authorization from Papua New Guinea.

³ The Intelsat 801 satellite will be re-deployed to 29.5° W.L via appropriate FCC authorization. See *Application for Special Temporary Authority to Drift the Intelsat 801 Satellite to 29.5° W.L.*, File No. SAT-STA-20091216-00146 (filed Dec. 16, 2009).

As demonstrated below, Intelsat is legally and technically qualified to operate Intelsat 25 as proposed. Moreover, there is good cause for waiver of certain limited technical requirements. Furthermore, grant of this application will serve the public interest by providing additional capacity for U.S. to Africa connectivity, which is in demand by customers. In accordance with the Commission's requirements,⁴ this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

I. BACKGROUND

As the Commission is aware, ProtoStar declared bankruptcy in July of this year. On Thursday, October 29, 2009, one of ProtoStar's assets—the ProtoStar 1 spacecraft—was auctioned as part of the bankruptcy proceeding. Intelsat was the winning bidder for this asset; Intelsat has no other relation to ProtoStar.

The ProtoStar 1 satellite was launched on July 7, 2008 and is currently located at 98.5° E.L.⁵ Intelsat expects to begin drifting the satellite in early January under authorization from Papua New Guinea. By mid-March 2010, Intelsat intends to operate the satellite at 31.5° W.L. (328.5° E.L.), where Intelsat 801 currently is licensed to operate.

II. INTELSAT IS QUALIFIED TO HOLD THE AUTHORIZATION REQUESTED HEREIN

A. Legal Qualifications

Intelsat is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat's compliance with the Commission's basic legal qualifications.⁶ In addition, Intelsat already holds

⁴ 47 C.F.R. § 25.114(c).

⁵ The licensing status of the ProtoStar 1 satellite prior to the bankruptcy proceeding is uncertain.

⁶ Because Intelsat 25, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis, Section 310(b) is not applicable to this license. *See Applications of The News*

multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.⁷

B. Technical Qualifications

In the attached Form 312, Schedule S, and Engineering Statement, Intelsat demonstrates that it is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information currently required by Section 25.114 of the Commission's rules. In addition, Intelsat's Engineering Statement provides information on compliance with the Commission's orbital debris mitigation rules.⁸

As described in Intelsat's Engineering Statement, Intelsat seeks to perform telemetry, tracking and telecommand ("TT&C") using both the standard and extended C-band. Specifically, Intelsat will use the 5850.5 MHz and 6419 MHz frequencies for command and the 3630 MHz and 4198.5 MHz frequencies for telemetry for the Intelsat 25 satellite. The Commission has previously determined that waiver is not required for Intelsat's use of the extended C-band for TT&C because this use will comply with the Commission's established regulations.⁹ Intelsat will operate in compliance with the Commission's Table of Frequency

Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp., Public Notice, 19 FCC Rcd 15,424, 15,425 n.5 (Int'l Bur. 2004).

⁷ *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consol. Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp., Memorandum Opinion and Order, 21 FCC Rcd 7368, 7381 (¶ 23) (2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").*

⁸ *Mitigation of Orbital Debris, Second Report and Order, 19 FCC Rcd 11,567 (2004).*

⁹ *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460, 15498 (¶ 92) (2000) (finding that Intelsat's use of the extended C-band did not require a waiver*

Allocations,¹⁰ and understands that operations in the extended C-band, including the proposed use of 3630 MHz for telemetry and 5850.5 MHz for command, are subject to certain limitations and obligations, which Intelsat accepts and will fulfill. Specifically, as required by footnotes US245 and NG185, Intelsat will only use these bands for international, inter-continental operations and notes that with respect to Section 2.108 of the Commission’s rules,¹¹ the power flux density on the Earth will not exceed the ITU limits applicable to the band 3600-3700 MHz, as shown in Exhibit 12 of the Engineering Statement. Intelsat also understands that the 5725-5875 MHz band is designated for industrial, scientific and medical (“ISM”) applications, and will accept any harmful interference caused by, and not claim protection from, these emissions.¹²

C. Request for Technical Waivers

Under Section 1.3 of the Commission’s rules, the Commission has the authority to waive its rules “for good cause shown.”¹³ Good cause exists if “special circumstances warrant a deviation from the general rule and such deviation will serve the public interest” better than adherence to the general rule.¹⁴ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of

of Section 25.202(a) of the rules because “Section 25.202(b) of our Rules provides that other frequencies and associated bandwidths of emission may be assigned on a case-by-case basis to space systems in conformance with Section 2.106 and the Commission’s rules and policies”).

¹⁰ See 47 C.F.R. § 2.106.

¹¹ See 47 C.F.R. § 2.108.

¹² See 47 C.F.R. § 2.106, note 5.150.

¹³ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹⁴ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

overall policy.”¹⁵ As shown below, there is good cause for waiver of Sections 25.202(g), 25.210(a)(3) and 25.211(a) of the Commission’s rules.

1. Section 25.202(g)

Intelsat requests a waiver of Section 25.202(g) with respect to the proposed use of 3630 MHz for telemetry for the Intelsat 25 satellite.¹⁶ Section 25.202(g) requires telemetry, tracking and telecommand functions to be “conducted at either or both edges of the allocated band(s).”¹⁷ The 3630 MHz telemetry frequency band is not at band edge.

In this case, waiver of Section 25.202(g) is warranted due to hardship. As noted above, Intelsat purchased this satellite already fully constructed and in orbit. Accordingly, Intelsat could not, and cannot, alter the location of the frequencies on the satellite. In other circumstances, the FCC has found the technical impossibility of modifying an in-orbit satellite to

¹⁵ *WAIT Radio*, 418 F.2d at 1159.

¹⁶As described above, Intelsat also will use the 5850.5 MHz and 6419 MHz frequencies for command and the 4198.5 MHz frequency for telemetry for the Intelsat 25 satellite. The proposed command frequencies are at the edge of the extended C-band and reasonably close to the edge of the standard C-band. The proposed 4198.5 MHz telemetry frequency is at the edge of the standard C-band. As such, it appears that no waiver of Section 25.202(g) would be required for use of these frequencies, including the 5850.5 MHz and 6419 MHz frequencies. *See Intelsat North America LLC, Application to Launch and Operate Intelsat 15, a Replacement Satellite, at 85.15 E.L.*, File Nos. SAT-AMD-20090528-00059 SAT-LOA-20090410-00043, condition 3 (stamp grant Nov. 25, 2009); *see also Northrop Grumman Space & Mission Systems Corp.*, Order and Authorization, 24 FCC Rcd 2330, 2362 (¶ 95) (Int’l. Bur. 2009) (finding that Section 25.202(g) requires only that TT&C operations occur at the band edges of an FSS band in which a spacecraft is providing service). However, to the extent the Commission believes that waiver of Section 25.202(g) is necessary to operate the command frequencies 5850.5 MHz and 6419 MHz, Intelsat herein seeks such waiver. Intelsat can confirm that operation of these frequencies will not cause harmful interference. The Intelsat 25 satellite is located between two Intelsat satellites, and Intelsat can therefore internally coordinate and resolve any interference issues. Furthermore, waiver is appropriate on hardship grounds. Because Intelsat 25 is an existing, operational spacecraft, its characteristics cannot be changed.

¹⁷ 47 C.F.R. § 25.202(g).

provide requisite good cause for granting a waiver.¹⁸ Granting a similar technical waiver to permit use of the 3630 MHz band for telemetry on the already launched Intelsat 25 satellite would be consistent with this precedent.

Grant of a waiver in this case also will not undermine the purpose of the rule. The requirement in Section 25.202(g) to put telemetry frequencies at band-edge is intended “to minimize interference potential between satellites”.¹⁹ Intelsat operates (or shortly will operate) the satellites using C-band frequencies that are immediately adjacent to 31.5° W.L. at the 29.5° W.L. orbital location²⁰ and at the 34.5° W.L. orbital location²¹ and thus can internally monitor and coordinate any interference to adjacent satellites. For these reasons, good cause exists to waive Section 25.202(g) to permit operation of Intelsat 25’s telemetry frequency at 3630 MHz.

2. Section 25.210(a)(3)

Intelsat seeks a waiver of Section 25.210(a)(3), which requires that space stations operating in the 4/6 GHz band be capable of switching polarization sense upon ground command. As described in the Engineering Statement, the polarization sense of the Intelsat 25 C-band transponders are static and cannot be changed.

¹⁸ See, e.g., *Modification of Authorization for Galaxy 12*, File No. SAT-MOD-20080630-00133 (grant stamp with conditions Sept. 2, 2008) (waiving the fuel venting requirement of Section 25.283(c) of the FCC’s rules for an in-orbit satellite).

¹⁹ *Amendment of Part 25 of the Commission’s Rules and Regulations to Reduce Alien Carrier Interference Between Fixed-Satellites at Reduced Orbital Spacings and to Revise Application Processing Procedures for Satellite Communication Services*, Second Report and Order and Further Notice of Proposed Rulemaking, 8 FCC Rcd 1316, 1317 (¶ 6) (1993).

²⁰ *Application for Special Temporary Authority to Drift the Intelsat 801 Satellite to 29.5° W.L.*, File No. SAT-STA-20091216-00146 (filed Dec. 16, 2009).

²¹ *Application of Intelsat LLC to Modify Authorizations*, File No. SAT-MOD-20011221-00139 (stamp grant Mar. 22, 2002) (granting Intelsat authority to operate the Intelsat 903 satellite at 34.5° W.L.).

Good cause exists to waive Section 25.210(a)(3) because waiver will not undermine the rule's policy objective to mitigate potential interference between adjacent fixed-satellite systems transmitting analog television signals.²² The Commission has previously waived Section 25.210 of its rules for satellites that coordinated their analog TV transmissions with adjacent operators.²³ In this case, there is little risk of harmful interference to adjacent satellites because Intelsat easily can self-coordinate with its own spacecraft at the nearest adjacent orbital locations. Indeed, Intelsat 801 currently operates at the 31.5° W.L. orbital location with similar polarization limitations without causing harmful interference to the operation of adjacent satellites. Moreover, in the event another operator's satellite is authorized to operate in the vicinity of 31.5° W.L., Intelsat will ensure that it coordinates the limited polarization switching capacity of Intelsat 25 with this operator.

3. Section 25.211(a)

Intelsat seeks a waiver of Section 25.211(a), which requires downlink analog video transmissions in the 3700 – 4200 MHz band to be transmitted only on the center frequency of 3700+20N, where N=1 to 24. As shown in Exhibit 5A and 5B of the Engineering Statement, within the 3700 – 4200 MHz band, Intelsat 25 utilizes a combination of 36 MHz and 72 MHz

²² See *Telesat Canada Petition for Declaratory Ruling for Inclusion of ANIK F3 on the Permitted Space Station List*, Order, 22 FCC Rcd 588, ¶ 10 (2007).

²³ See *id.* (“Telesat has already coordinated its analog TV transmissions with adjacent C-band operators serving the U.S. market, and plans to transmit such signals only on the transponders that have been coordinated for such use. Since the potential for harmful interference between FSS systems transmitting analog television signals has been mitigated, there is no need to require ANIK F3 to employ a polarity-switching capability.”); *Telesat Canada Petition for Declaratory Ruling For Inclusion of ANIK F1 on the Permitted Space Station List*, Order, 15 FCC Rcd 24828, at ¶ 17 (2000) (“[W]e conclude that waiving Section 25.210(a)(3) will not undercut the policies underlying the Commission's adoption of this rule, provided that we place the appropriate conditions on this waiver. First, this waiver will remain in effect only as long as ANIK F1 remains at 107.3° W.L. Second, Telesat is required to operate ANIK F1 in accordance with the coordination agreements it has reached with operators of satellites that have been authorized to provide service to the U.S. market, and any future coordination agreements.”).

wide transponders. Although placement of TV/FM signals within the 36 MHz wide transponders would be compliant with Section 25.211(a), the placement of TV/FM signals within the 72 MHz wide transponders may not be compliant with this section of the rules, depending on the actual carrier loading. The nearest co-frequency satellites to Intelsat 25 that may be impacted by the placement of TV/FM on center frequencies that may not be compliant with Section 25.211(a) are Intelsat 903 and Intelsat 907, which are both licensed to Intelsat. Intelsat will be able internally to coordinate the transmission of TV/FM on Intelsat 25 vis-à-vis Intelsat 903 and Intelsat 907. In light of this fact, and given that Intelsat 25 is an existing, in-orbit satellite whose technical characteristics cannot be altered, there is good cause for waiver of Section 25.211(a).

D. Request for Grant Without Milestones or a Bond

The International Bureau should grant this application without imposing milestones²⁴ or a bond.²⁵ Because Intelsat 25 already is in-orbit and operating, all milestones for this satellite have been satisfied and Intelsat is not required to post a bond.²⁶ Indeed, the Commission has granted similar applications for in-orbit satellites without imposing milestones or a bond.²⁷

Alternatively, out of an abundance of caution and to the extent necessary, Intelsat requests a waiver of Sections 25.164(a) and 25.165²⁸ of the rules for any possible milestone or bond associated with the operation of the frequency bands 3400-3625 MHz, 5845–5850 MHz,

²⁴ 47 C.F.R. § 25.164(a).

²⁵ 47 C.F.R. § 25.165.

²⁶ See *Loral Skynet Network Services, Inc.*, 21 FCC Rcd 14,365 (Int’l Bur. 2006) (“Because Telstar 18 is in-orbit and operating, Loral is not required to post a bond.”).

²⁷ See *Application of PanAmSat Licensee Corp. to Modify Authorization for Galaxy 11*, File No. SAT-MOD-20080225-00051 (stamp grant July 22, 2008); *PanAmSat Licensee Corp., Application to Modify Authorization to Relocate Intelsat 5 to 169.0° E.L.*, File No. SAT-MOD-20080725-00150 (stamp grant Oct. 17, 2008).

²⁸ 47 C.F.R. §§ 25.164(a) and 25.165.

6425-6645 MHz, 12.25-12.50 GHz and 13.75-14.00 GHz which are on the Intelsat 25 satellite but not authorized for operation on the Intelsat 801 satellite currently operating at 31.5° W.L. Waiver is appropriate in this case because there is no concern about warehousing.²⁹ The Intelsat 25 satellite is already in-orbit and will be able to provide service in these additional frequencies from the 31.5° W.L. location in a much more timely manner than the five years that would be allowed to an applicant intending to construct, launch, and operate a new satellite at this location. Moreover, there is no realistic risk of another operator seeking a license to operate in these extended bands at this location given that the conventional C-and Ku-bands are already licensed to Intelsat.

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Grant of this application will serve the public interest by providing additional capacity with U.S. to Africa connectivity. Intelsat recently has experienced very high customer demand for capacity with such connectivity. The operation of Intelsat 25 at 31.5° W.L. will help Intelsat meet this customer demand. Indeed, Intelsat 25 is well-suited to satisfy customer demand because it is an in-orbit satellite which can be moved relatively quickly to the 31.5° W.L. orbital location.

This application proposes replacing Intelsat 801 before that satellite reaches the end of its useful life. The Commission recognizes a “replacement expectancy” in orbital locations in order to protect the large investments made by satellite operators. The agency has stated,

[G]iven the huge costs of building and operating satellite space stations, there should be some assurance that operators will be able to continue to serve their customers. The Commission has

²⁹ See *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760, ¶ 170 (2003) (“[b]y making the bond payable upon failure to meet any milestone . . . we further strengthen our protections against speculation and warehousing.”).

therefore stated that, when the orbit location remains available for a U.S. satellite with the technical characteristics of the proposed replacement satellite, it will generally authorize the replacement satellite at the same location.³⁰

Here, Intelsat holds a replacement expectancy for the 31.5° W.L. orbital location because the Commission authorized Intelsat to operate Intelsat 801 at that location.³¹ Although the Intelsat 25 satellite does not technically qualify as a “replacement satellite” as that term has been defined by the Commission,³² it is replacing the bulk of the existing C- and Ku-band frequencies on the Intelsat 801 satellite and thus should be granted pursuant to Intelsat’s replacement expectancy.

Moreover, grant of this application will resolve any possible controversy about the state of licensing of the in-orbit ProtoStar 1 satellite. Further, the public interest will be served by bringing this satellite under the licensing jurisdiction of the United States. The FCC has acknowledged the public interest in having the United States serve as a satellite licensing administration.³³ Grant of this application will “U.S. flag” an in-orbit satellite and thus ensure conformity of the satellite to U.S. space policy and regulation.

³⁰ *Columbia Commc’ns Corp. Authorization to Launch and Operate a Geostationary C-band Replacement Satellite in the Fixed-Satellite Service at 37.5° W.L.*, Memorandum Opinion and Order, 16 FCC Rcd 20176, 20178-79 (¶ 7) (2001) (internal citations omitted) (citing *Assignment of Orbital Locations to Space Stations in Domestic Fixed-Satellite Serv.*, Memorandum Opinion and Order, 3 FCC Rcd 6972, 6976 (n.31) (1988) and *GE American Commc’ns, Inc.*, Order and Authorization, 10 FCC Rcd 13775, 13775-776 (¶ 6) (Int’l Bur. 1995)).

³¹ *In the Matter of the Applications of INTELSAT LLC For Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000).

³² *See supra* note 1.

³³ *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Order and Opinion, 15 FCC Rcd 15460, 15475 (2000).

III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate the 3400-4200 MHz, 5850-6645 MHz, 11.45-11.70 GHz, 12.50-12.75 GHz, and 13.75-14.5 GHz frequencies on the Intelsat 25 satellite at 31.5° W.L. will be conditioned as follows:

- (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (“ITSO”) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
- (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.³⁴

This condition will not apply to the 5845–5850 MHz and 12.25-12.50 GHz frequency bands on Intelsat 25 at 31.5° W.L. because these frequencies were not transferred to Intelsat upon privatization.

IV. ITU COST RECOVERY

Intelsat is aware that processing fees are currently charged by the ITU for satellite filings, and that Commission applicants are responsible for any and all fees charged by the ITU. Intelsat is aware of and unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of Intelsat for use of extended C- and Ku-band frequencies at the 31.5° W.L. orbital location, as well as any ITU filings associated with any satellite system for which Intelsat may request authorization at a later date.

³⁴ See *Petition of the Int’l. Telecomms. Satellite Org. under Section 316 of the Commc’ns Act*, as amended, IB 06-137, File No. SAT-MS-C-20060710-00076, Order of Modification, 23 FCC Rcd 2764, 2769-71 (¶¶11-13) (Int’l Bur. 2008).

V. CONCLUSION

Based on the foregoing, Intelsat respectfully requests that the Commission grant this satellite application.

Respectfully submitted,

/s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Jennifer D. Hindin
WILEY REIN LLP
1776 K Street, N.W.
Washington, DC 20006

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Exhibit A
FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved the foreign ownership in Intelsat North America LLC (“Intelsat”). *See 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”)*. In December 2009, the Commission also approved certain pro forma changes in Intelsat’s foreign ownership. There have been no other material changes to the foreign ownership since the date of the *Intelsat-Serafina Order*.

Exhibit B
FCC Form 312, Response to Question 36: Cancelled Authorizations

Intelsat North America LLC (“Intelsat”) has never had an FCC license “revoked.”

However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat Licensee Corp. (“PanAmSat”), a sister company of Intelsat North America LLC, based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones. *See* PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000). In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by Question 36, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on either PanAmSat’s or Intelsat’s basic qualifications, which are well-established and a matter of public record.

Exhibit C
FCC Form 312, Response to Question 40:
Officers, Directors, and Ten Percent or Greater Shareholders

Following are the officers of Intelsat North America LLC:

Michael McDonnell, Chairman
Andrew Stimson, Deputy Chairman
Phillip Spector, Secretary
Simon Van De Weg, Director, Finance

Following are the members of the Board of Managers of Intelsat North America LLC:

Michael McDonnell
Andrew Stimson
Phillip Spector

The address of all Intelsat North America LLC officers and members of the Board of Managers is:

23 avenue Monterey
L-2086 Luxembourg

Intelsat North America LLC is wholly owned by Intelsat LLC, a Delaware limited liability company. Intelsat LLC is wholly owned by Intelsat Holdings LLC, a Delaware limited liability company. Intelsat Holdings LLC is wholly owned by Intelsat Subsidiary Holding Company, S.A., a Luxembourg company. Intelsat Subsidiary Holding Company, S.A. is wholly owned by Intelsat Intermediate Holding Company, S.A., a Luxembourg company. Intelsat Intermediate Holding Company, S.A. is wholly owned by Intelsat Jackson Holdings, S.A., a Luxembourg company. Intelsat Jackson Holdings, S.A. is wholly owned by Intelsat (Luxembourg), S.A., a Luxembourg company. Intelsat (Luxembourg), S.A. is wholly owned by Intelsat, S.A., a Luxembourg company. Intelsat, S.A. is wholly owned by Intelsat Holdings, S.A., a Luxembourg company. Intelsat Holdings, S.A. is wholly owned by Intelsat Global Subsidiary, S.A., a Luxembourg company. Intelsat Global Subsidiary, S.A. is wholly owned by Intelsat Global, S.A., a Luxembourg company (“Intelsat Global”, formerly “Serafina Holdings Limited”). Each of these entities may be contacted at the following address: 23 avenue Monterey, L-2086 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *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*”).