Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of Intelsat License LLC Amendment to Application for Authority to Launch and Operate Galaxy 30, a Replacement Satellite With New Frequencies, at 125.0º W.L. (235.0º E.L.)	File No. SAT-AMD-_____

AMENDMENT TO APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE GALAXY 30, A REPLACEMENT SATELLITE WITH NEW FREQUENCIES, AT 125.0º W.L.

Intelsat License LLC ("Intelsat"), pursuant to Section 25.116 of the Federal Communications Commission's ("FCC" or "Commission") rules,[1] hereby amends its pending application to launch and operate an L/C/Ku/Ka-band replacement satellite with new frequencies, to be known as Galaxy 30 (previously known as Galaxy 14R) (Call Sign S3016), at the 125.0° W.L. orbital location ("Application") to add additional Ku- and Ka-band frequencies, remove certain Ka-band frequencies, and add a Wide Area Augmentation System ("WAAS") payload.[2] Specifically, Intelsat is amending the Application to add the following Ku-band frequencies: 10700-10950 MHz, 11200-11450 MHz and 12750-13250 MHz;[3] add the following Ka-band

[1] 47 C.F.R. § 25.116.

[2] *See* Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 14R, a Replacement Satellite with New Frequencies, at 125.0º W.L Call Sign S3016, File No. SAT-LOA-20170525-00079 (filed May 25, 2017).

[3] Intelsat's amendment also includes the addition of the 14000-14500 MHz band on the spacecraft, however Intelsat is not seeking authority to operate in this band.

frequencies: 19300-19400 MHz and 19600-19700 MHz;[4] to remove the following Ka-band frequencies: 18800-19200 MHz and 28600-29000 MHz; and to seek authority to provide radio navigation satellite service ("RNSS") using the following WAAS frequencies: 1165.45-1187.45 MHz, 1564.42-1586.42 MHz, 6597.58-6619.58 MHz, and 6648.73-6670.73 MHz. Finally, Intelsat is removing two of its requests for waiver of the Table of Frequency Allocations. For the Commission's convenience, Intelsat supplies herewith an updated version of the Legal Narrative, Engineering Statement, and Schedule S.

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed replacement satellite with new frequencies. Moreover, grant of this application will serve the public interest by ensuring continuity of service to customers in C-band at the 125.0º W.L. orbital location, by adding new Ku- and Ka-band capacity at this location and, with the addition of the WAAS payload, by enhancing the accuracy of Global Positioning System ("GPS") signals for WAAS-certified avionics during FAA approved phases of flight.

In accordance with the Commission's requirements,[5] this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

I. 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

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[4] Intelsat's amendment also includes the addition of the 19400-19600 MHz and 29100-29250 MHz bands on the spacecraft, however Intelsat is not seeking authority to operate in these bands.

[5] 47 C.F.R. § 25.114(c).

compliance with the Commission's basic legal qualifications. In addition, Intelsat already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.[6]

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, the Engineering Statement provides information demonstrating Intelsat's compliance with the Commission's orbital debris mitigation rules.[7]

C. Operational Frequencies

The following chart shows the frequencies that the Galaxy 30 satellite is capable of using and the frequencies that are currently used by the Galaxy 14 satellite (Call Sign S2385) at 125.0° W.L. Unless otherwise indicated, this chart describes the frequencies that the Galaxy 30 satellite will use at that location.

	Galaxy 14	Galaxy 30
1165.45-1187.45 MHz		✓
1564.42-1586.42 MHz		✓
3700-4200 MHz	✓	✓
5925-6425 MHz	✓	✓

[6] *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consolidated 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 (rel. June 19, 2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

[7] *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

	Galaxy 14	Galaxy 30
6425-6725 MHz		✓[8]
10700-10950 MHz		✓
10950-11200 MHz		✓
11200-11450 MHz		✓
11450-11700 MHz		✓
12750-13250 MHz		✓
13750-14000 MHz		✓
14000-14500 MHz		✓[9]
17800-18800 MHz		✓
19200-19300 MHz		✓
19300-19400 MHz		✓
19400-19600 MHz		✓[10]
19600-20200 MHz		✓
27500-28600 MHz		✓
29000-29100 MHz		✓
29100-29250 MHz		✓[11]
29250-30000 MHz		✓

All of the existing frequencies licensed on Galaxy 14 are also on Galaxy 30. In addition, Galaxy 30 contains new frequencies at 1165.45-1187.45 MHz, 1564.42-1586.42 MHz, 6425-6725 MHz, 10700-10950 MHz, 10950-11200 MHz, 11200-11450 MHz, 11450-11700 MHz, 12750-13250 MHz, 13750-14000 MHz, 17800-18800 MHz, 19200-19300 MHz, 19300-19400 MHz, 19600-20200 MHz, 27500-28600 MHz, 29000-29100 MHz, and 29250-30000 MHz that are not on the Galaxy 14 satellite.

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[8] The 6425-6725 MHz band includes the 6597.58-6619.58 MHz and 6648.73-6670.73 MHz WAAS feeder links.

[9] Intelsat is not seeking authority to operate in the 14000-14500 MHz band.

[10] Intelsat is not seeking authority to operate in the 19400-19600 MHz, band.

[11] Intelsat is not seeking authority to operate in the 29100-29250 MHz band.

D. Waiver Requests

Intelsat requests a limited waiver of Section 2.106, Footnote NG52 of the Table of Frequency Allocations, which restricts the use of the 10700-11700 MHz and 12750-13250 MHz bands by the non-federal fixed satellite service in the geostationary orbit to international systems only.[12] In its original Application, Intelsat requested waiver of Section 2.106, which at the time the Application was filed allocated the 17800-18300 MHz to the Fixed Service ("FS") and Section 2.106, Footnote NG165, which designated the use of the 18800-19300 MHz band to non-geostationary satellite ("NGSO") Fixed Satellite Services ("FSS") operations. However, because of the Commission's recent changes to Section 2.106 adopted in its Parts 2 and 25 *Report and Order*,[13] these waivers are no longer necessary.

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."[14] 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.[15] In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."[16]

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12 47 C.F.R. § 2.106, fn. NG52. Footnote NG52 was formerly footnote NG104.

13 *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters, IB Docket No. 16-408*, Report and Order and Further Notice of Proposed Rulemaking, FCC 17-122, 2017 WL 4316351, at Appendix A (Sep. 27, 2017) (amending 47 C.F.R. § 2.106 & NG165).

14 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

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

16 *WAIT Radio*, 418 F.2d at 1159.

Good cause exists to waive the international-only requirements for the 10700-11700 MHz and 12750-13250 MHz frequency bands on Galaxy 30. The purpose of NG52 is to limit the number of the fixed satellite service earth stations with which the co-primary FS would need to coordinate.[17] The International Bureau has found that waiving NG52 would not undermine the purpose of the rules if the party seeking a waiver: (1) will be utilizing earth stations that are receive-only in the 10700-11700 MHz band and thus "not capable of causing interference into FS stations" operating in the bands; and (2) agrees to "accept any level of interference from FS stations" in that band.[18]

With respect to the 10700-11700 MHz band, grant of the requested waiver satisfies these criteria and would be consistent with precedent.[19] The earth stations operating in that band on Galaxy 30 will not transmit and Intelsat agrees to accept any level of interference into those earth stations from FS stations in the band. Intelsat will provide services in the 10700-11700 MHz and 12750-13250 MHz frequency bands only on a non-interference/non-protected basis. Accordingly, the earth stations operating in these bands pose no interference concerns with respect to co-frequency FS stations and therefore will not need to be coordinated with FS stations located within United States and its territories.

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17 *See Amendment of Part 2 of The Commission's Rules to Conform, to the Extent Practicable, with the Geneva Radio Regulations, as Revised by the Space WARC, Geneva*, Report and Order, 26 RR 2d 1257, ¶¶ 35-38 (1973). *See also EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83º W.L. Orbital Location*, Order and Authorization, 20 FCC Rcd 919, ¶ 9 (Int'l Bur. 2004) ("EchoStar 83º Waiver").

18 EchoStar 83° Waiver, ¶ 13.

19 *See, e.g., DIRECTV Enterprises, LLC, Fleet Management Notice for SKY-B1 Satellite*, Stamp Grant, File No. SAT-MOD-20170221-00019, Condition 10 (May 11, 2017).

Intelsat also agrees to abide by the customer notification requirements that the International Bureau has previously imposed when granting waivers of NG52.[20] Intelsat will inform its customers in writing, including any customers receiving end-user services from resellers accessing capacity on Galaxy 30, of the potential for interference from FS operations in the 10700-11700 MHz band.

E. Milestone and Bond Requirements

Galaxy 30 will be subject to the milestone and bond posting requirements set forth in Sections 25.164 and 25.165 of the Commission's rules because the 1165.45-1187.45 MHz, 1564.42-1586.42 MHz, 6425-6725 MHz, 10700-10950 MHz, 10950-11200 MHz, 11200-11450 MHz, 11450-11700 MHz, 12750-13250 MHz, 13750-14000 MHz, 17800-18800 MHz, 19200-19300 MHz, 19300-19400 MHz, 19600-20200 MHz, 27500-28600 MHz, 29000-29100 MHz, and 29250-30000 MHz frequencies are included on Galaxy 30 but are not on the Galaxy 14 satellite it is replacing.[21]

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

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 therefore stated that, when the orbit location remains available for a U.S. satellite with the technical characteristics of the proposed

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[20] *See, e.g., id.; Intelsat North America Request for Waiver*, Stamp Grant, File No. SAT-MOD-20050610-00122, Condition 3 (Sept. 30, 2005); EchoStar 83º Waiver, ¶ 13.

[21] 47 C.F.R. §§ 25.164 and 25.165.

> replacement satellite, it will generally authorize the replacement satellite at the same location.[22]

In this case, Intelsat holds a replacement expectancy for the C-band frequencies at the 125.0º W.L. orbital location because the Commission authorized Intelsat to operate Galaxy 14 at that location.[23]

Grant of this application will serve the public interest by ensuring continuity of service to consumers from the 125.0° W.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 125.0º W.L. orbital location before Galaxy 14 reaches the end of its useful life or is relocated. The Commission has stated that granting replacement applications ensures that service will be provided to consumers as efficiently as possible because the current licensee will be familiar with the service requirements and, given its experience, should be able to deploy a replacement satellite in the shortest possible time.[24]

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[22] *Columbia Communications Corporation 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, ¶ 7 (2001) (citing *Assignment of Orbital Locations to Space Stations in Domestic Fixed-Satellite Service*, Memorandum Opinion and Order, 3 FCC Rcd 6972, n.31 (1988) and *GE American Communications, Inc.*, Order and Authorization, 10 FCC Rcd 13775, ¶ 6 (Int'l Bur. 1995)).

[23] *See Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00340, File No. SAT-MOD-20051206-00261 (Jan. 27, 2006).

[24] *See Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, 18 FCC Rcd 1962, ¶ 83 (2003) ("Repairing or even replacing a malfunctioning satellite, for all its complexity, requires less time than designing and constructing a new system. Even in the worst case where a satellite is destroyed, a licensee can ordinarily replace a lost satellite with a ground spare at the next available launch window, or procure a technically identical satellite in an expedient manner since it would have already completed the complex design process.").

In addition, the Galaxy 30 satellite will allow Intelsat to expand its service offering in the region, for the benefit of consumers, by adding new Ku- and Ka-band capacity, at the location. This expansion of capacity will serve the public interest.

Finally, the addition of the WAAS payload will further serve the public interest by providing additional RNSS capacity, which in turn will enhance the accuracy of Global Positioning System ("GPS") signals and increase airline safety. The WAAS payload on Galaxy 30 is part of a program managed by the Federal Aviation Administration ("FAA").[25] WAAS enabled GPS receivers will receive data from the WAAS payload on Galaxy 30 and use this data to correct the measured GPS positions. This FAA service improves aircraft precision landings and enhances flight safety on GPS-enabled aircraft. The WAAS payload on Galaxy 30 will supplement a network of WASS-equipped satellites.[26]

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.[27] Intelsat

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[25] Leidos is one of the administrators of the WAAS network pursuant to an agreement with the FAA. Intelsat General Corporation has entered into a subcontract with Leidos.

[26] The Commission has previously authorized WAAS payloads on the following satellites: Galaxy 15 (S2387), *see Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00233, File Nos. SAT-LOA-19991207-00119, SAT-AMD-20021029-00199, SAT-AMD-20030818-00156, SAT-AMD-20031103-00320, and SAT-AMD-20040603-00111 (Aug. 13, 2004); Anik F1R (S2674), *see Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00309, File No. SAT-PPL-20050504-00094 (Jul. 22, 2005); Inmarsat 4F3 (S2932), *see Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00309, File No. SAT-PPL-20050504-00094 (Jul. 22, 2005); Eutelsat 117WB (S2926) (formerly Satmex 9), *see Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01103, File Nos. SAT-LOI-20140617-00070 and SAT-AMD-20141119-00123 (Aug. 21, 2015); and SES-15 (S2951), *see Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01205, File No. SAT-MPL-20160718-00063 (Dec. 16, 2016).

[27] *See* 47 C.F.R. § 25.111(d).

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 the satellite proposed in this Application, as well as any ITU filings associated with any satellite system for which Intelsat may request authorization at a later date.

V. USE OF THE 10700-11700 AND 13750-14000 MHz FREQUENCY BANDS

Intelsat understands that operations in the 10700-11700 MHz and 13750-14000 MHz frequency bands are subject to certain limitations and obligations, which Intelsat accepts and will fulfill.[28] Specifically, for operations in the 10700-11700 MHz frequency bands, Intelsat accepts the following condition:

- Operations in the 10700-11700 MHz frequency band shall comply with the terms of footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference.

For operations in the 13750-14000 MHz band, Intelsat accepts the following conditions:

- In the 13750-14000 MHz band (Earth-to-space), receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.

- Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, any earth station in the United States and its possessions communicating with the Galaxy 30 space station in the 13750-13800 MHz band (Earth-to-space) is required to coordinate through National Telecommunications and Information Administration's ("NTIA") Interdepartment Radio Advisory Committee's ("IRAC") Frequency Assignment Subcommittee ("FAS") to minimize interference to the National Aeronautics and Space Administration Tracking and Data Relay Satellite System, including manned space flight.

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[28] Intelsat is also aware that frequencies in the 27.5-28.35 GHz band are secondary for GSO FSS. 47 C.F.R. § 25.202(a)(1).

- Operations of any earth station in the United States and its possessions communicating with the Galaxy 30 space station in the 13750-14000 MHz band (Earth-to-space) shall comply with footnote US356 of United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356, which specifies a mandatory minimum antenna diameter of 4.5 meters and a non-mandatory minimum and maximum equivalent isotropically radiated powers ("e.i.r.p."). Operations of any earth station located outside the United States and its possessions communicating with the Galaxy 30 space station in the 13750-14000 MHz band (Earth-to-space) shall be consistent with footnote 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.

VI. CONCLUSION

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

Respectfully submitted,

/s/ Susan H. Crandall

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April 10, 2018

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

The Commission previously approved foreign ownership in Intelsat License LLC ("Intelsat"), in the *Intelsat-Serafina Order*.[1] In December 2009 and October 2011, the Commission also approved *pro forma* changes in Intelsat's foreign ownership.[2] There have been no other material changes to Intelsat's foreign ownership since the date of the *Intelsat-Serafina Order*.

[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).

[2] *See Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011).

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

Intelsat License 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 a former Intelsat entity, PanAmSat Licensee Corp. ("PanAmSat"),[3] based on the Bureau's finding that PanAmSat had not satisfied applicable construction milestones.[4] 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 Intelsat's basic qualifications, which are well-established and a matter of public record.

[3] All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. *See* IBFS File Nos. SAT-ASG-20101203-00252 (granted Dec. 23, 2010), SES-ASG-20101203-0150 (granted Dec. 20, 2010), and SES-ASG-20101206-01502 (granted Dec. 20, 2010).

[4] *See PanAmSat Licensee Corp*., Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).

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

The officers and directors/managers of Intelsat License LLC are as follows:

Officers:
Jacques Kerrest, Chairman
Franz Russ, Deputy Chairman
Michelle Bryan, Secretary
Mirjana Hervy, Director, Finance

Board of Managers:
Jacques Kerrest
Franz Russ
Michelle Bryan

The business address of all Intelsat License LLC officers and members of the Board of Managers is:
4 rue Albert Borschette
L-1246 Luxembourg

Intelsat License LLC is a Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License Holdings LLC 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 Investments S.A., a Luxembourg company. Intelsat Investments S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Investment Holdings S.à r.l., a Luxembourg company. Intelsat Investment Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat S.A.'s ownership was approved by the Commission as part of the *Intelsat-Serafina Order* and the recent Intelsat Pro Forma 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*"); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011) ("Intelsat Pro Forma"). On May 16, 2012, the International Bureau granted an application to transfer control of Intelsat pursuant to a public offering of newly issued voting shares by Intelsat, subsequent voting share sales by current shareholders and possible private placements of newly issued voting shares. *In the Matter of Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, DA 12-768 (rel. May 16, 2012). This change of control has not yet been fully consummated.