

**Response to Questions 30-34: Alien Ownership**

In questions 30 through 34, Telesat Canada (“Telesat”) identifies itself as a corporation organized under the laws of a foreign government. However, this Petition for Declaratory Ruling seeks only to permit U.S.-licensed ALSAT earth stations to access Anik F3, a non-U.S. satellite, consistent with the *DISCO II Reconsideration Order*.<sup>1</sup> Thus, Telesat’s foreign ownership poses no U.S. licensing concerns.

In any event, in the *DISCO II Order*, the Commission essentially created a blanket waiver of alien ownership restrictions by adopting “a rebuttable presumption that applications by investors from WTO Member countries to exceed the 25 percent foreign ownership limitation under Section 310(b)(4) will promote competition.”<sup>2</sup> Accordingly, Telesat’s request for declaratory ruling raises no foreign ownership concerns, and should be granted.

---

<sup>1</sup> *Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, First Order on Reconsideration, 15 FCC Rcd 7207 (1999).

<sup>2</sup> *Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, Report and Order, 12 FCC Rcd 24094, 24159 (1997).