

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat North America LLC

Application for Authority to Launch and
Operate Intelsat 18, a Replacement
Satellite with New Frequencies, at 180.0°
E.L.

File No. SAT-RPL- _____

**APPLICATION FOR AUTHORITY TO LAUNCH
AND OPERATE INTELSAT 18, A REPLACEMENT SATELLITE
WITH NEW FREQUENCIES, AT 180.0° E.L.**

Intelsat North America LLC (“Intelsat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Intelsat 18, at the 180.0° E.L. orbital location. Intelsat 18 is scheduled for launch on a Land Launch vehicle in the first quarter of 2011 and will replace the Intelsat 701 satellite (call sign S2400), which is currently operating at 180.0° E.L.² Intelsat 18 will operate on a non-common carrier basis.³

¹ 47 C.F.R. § 25.114.

² See *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 15,460 (2000). Following traffic transition and pursuant to a future request, Intelsat 701 will be re-deployed to a different location.

³ Because Intelsat 18, 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 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).

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed replacement satellite. Moreover, grant of this application will serve the public interest by ensuring continuity of service to U.S. customers at 180.0° E.L. 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. INTELSAT IS QUALIFIED TO HOLD THE REPLACEMENT AUTHORIZATION REQUESTED HEREIN

A. Legal Qualifications

Intelsat is legally qualified to hold the replacement 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. In addition, Intelsat already holds multiple Commission satellite licenses, and its "legal qualifications are a matter of record" before the Commission.⁵

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 its compliance with the Commission's orbital debris mitigation rules.⁶

⁴ 47 C.F.R. § 25.114(c).

⁵ *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEO 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, FCC 06-85, ¶ 23 (rel. June 19, 2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

⁶ *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11,567 (2004).

C. Requests for Waivers

Intelsat requests waiver of the following technical rules:

- (1) Section 25.114(d)(3), which requires a specific format for the presentation of space station contours;
- (2) Section 25.202(g), which requires telemetry, tracking and telecommand functions to be allocated at the band edge; and
- (3) Footnote NG 104 of the U.S. Table of Allocations and footnote 2 of Section 25.202(a)(1) of the rules, which limits use of the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands to “international systems.”

Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”⁷ 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.⁸ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”⁹ As shown below, there is good cause for each of the requested technical waivers.

1. Request for Waiver of Section 25.114(d)(3)

Intelsat requests a waiver of Section 25.114(d)(3), which requires that the space station antenna gain contour(s) for each transmit and receive antenna beam be plotted on an area map at 2 dB intervals down to 10 dB below peak value of the parameter and at 5 dB intervals between 10 dB and 20 dB below peak values. Intelsat requests a waiver of Section 25.114(d)(3) with respect to Intelsat 18’s wide coverage and omni-directional antenna gain diagrams (Exhibits 6U,

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

⁸ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁹ *WAIT Radio*, 418 F.2d at 1159.

6V, 6X, and 6Y of the Engineering Statement), and the C-band and Ku-band ULPC antenna gain diagrams (Exhibits 6Z1 and 6Z2 of the Engineering Statement).

Good cause exists for granting these waivers of Section 25.114(d)(3). First, as explained more fully on page 12 of the attached Engineering Statement, the satellite manufacturer did not provide the patterns for the wide coverage and omni-directional antennas in the required format, as the pointing of the antennas to Earth will vary during an emergency situation. However, Intelsat provides a descriptive characterization of the beam patterns in Section 2.7.1 of the Engineering Statement in addition to the antenna beam patterns in Exhibits 6U, 6V, 6X and 6Y of the Engineering Statement. Second, as explained more fully on page 16 of the attached Engineering Statement, for the C-band and Ku-band ULPC antenna gain diagrams, satellite manufacturers typically do not provide the patterns in the required format. Intelsat, however, provides a descriptive characterization of these beams in Section 2.8.1 of the Engineering Statement. To the extent necessary, there is good cause to waive Section 25.114(d)(3) in these cases because Intelsat's descriptive characterizations, coupled with the beam patterns provided by the manufacturer, fulfill the information requirements of Section 25.114(d)(3). In addition, granting the requested waiver would be consistent with precedent. The FCC has previously waived Section 25.114(d)(3) in similar circumstances.¹⁰

2. Request for Waiver of Section 25.202(g)

To the extent necessary, Intelsat requests a waiver of Section 25.202(g) with respect to the proposed use of command functions on the 6176.3 MHz and 6173.7 MHz frequencies and telemetry on the 3947.5 MHz and 3952.5 MHz frequencies. Section 25.202(g) requires

¹⁰ See *Intelsat North America LLC Application for Authority to Launch and Operate Intelsat 15, a Ku-band Replacement Satellite at 85.15° E.L.*, File No. SAT-LOA-20090410-00043 and SAT-AMD-20090528-00059 (stamp grant with conditions Nov. 25, 2009).

telemetry, tracking and telecommand functions to be “conducted at either or both edges of the allocated band(s).”¹¹ As noted in the Engineering Statement, the command and telemetry frequencies of Intelsat 18 are located in the middle, not the edge, of the allocated C-band.

In this case, waiving Section 25.202(g) better serves the public interest than strict adherence to the rule. The specific command and telemetry channels for Intelsat 18 are a subset of those on Intelsat 701, the spacecraft that Intelsat is replacing, and were chosen so as to minimize any corresponding hardware impact on Intelsat’s ground control stations. Moreover, Intelsat 18 will be operating from an orbital location, 180.0° E.L., where the command and telemetry frequencies of other adjacent satellites may or may not be located at the edge of the operating band. In such cases, TT&C related transmissions are addressed through normal coordination agreements with other affected satellite operators.

Grant of a waiver in this case will also not undermine the purpose of the rule. The requirement in Section 25.202(g) to put telemetry and command frequencies at band-edge is intended “to minimize interference potential between satellites”.¹² The nearest co-frequency satellites to Intelsat 18 at 180.0° E.L (180.0° W.L.) are Intelsat 602 (call sign S2389) located at 177.85° E.L. (182.15° W.L.)¹³ and SES World Skies NSS 9 (call sign S2756) located at 183.0°

¹¹ 47 C.F.R. § 25.202(g).

¹² *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).

¹³ *See Policy Branch Information; Actions Taken*, Report No. SAT-00545, File No. SAT-MOD-20080512-00102 (Aug. 8, 2008) (Public Notice) (authorizing Intelsat to operate Intelsat 602 at 177.85° E.L.).

E.L. (177.0° W.L.).¹⁴ Intelsat can internally monitor and coordinate any interference to the adjacent Intelsat 602. In addition, operation of the Intelsat 18 command and telemetry will be conducted within the conditions established in an existing coordination agreement with SES World Skies. For these reasons, good cause exists to waive Section 25.202(g) to permit operation of Intelsat 18's command and telemetry frequencies at the middle of the allocated C-band.

3. Request for Waiver of Footnote NG 104 of the U.S. Table of Allocations and Footnote 2 of Section 25.202(a)(1)

Intelsat requests waiver of footnote NG104 of the Table of Allocations and footnote 2 of Section 25.202(a)(1) of the Commission's rules, which limit use of the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands to "international systems."¹⁵ Intelsat seeks a waiver in order to use the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands to offer domestic services on a non-interference basis in the U.S.

Good cause exists to waive the international only requirements for the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands. The purpose of NG 104 and footnote 2 of Section 25.202(a)(1) is to limit the number of the fixed satellite service earth stations with which the co-primary fixed service would need to coordinate.¹⁶ Intelsat will provide services in the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands only on a non-interference/non-protected basis, and

¹⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00617, File No. SAT-LOI-20081223-00238 (July 10, 2009) (Public Notice) (authorizing SES World Skies (formerly New Skies Satellites B.V.) to operate NSS-9 at 177° W.L.).

¹⁵ See 47 C.F.R. § 2.106 fn. NG104; 47 C.F.R. § 25.202(a)(1) fn. 2.

¹⁶ See *Satellite Services*, 26 RR 2d at 1263-65. 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 83 ° W.L. Orbital Location*, Order and Authorization, DA 04-3162, ¶ 9 (Int'l Bur., Sept. 30, 2004) ("*EchoStar 83° Waiver*").

therefore will not need to coordinate with fixed service stations. Additionally, the Commission previously granted a waiver of NG 104 and footnote 2 of Section 25.202(a)(1) to the Intelsat 701 satellite that Intelsat 18 seeks to replace at the 180.0° E.L. orbital location¹⁷; consequently, earth stations using these frequency bands on a non-interference/non-protected basis and pointing to this orbital location are already in operation.

Moreover, grant of this waiver is consistent with the Commission's precedent. A waiver of the Table of Allocations is generally granted "when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services."¹⁸ The International Bureau has found that waiving NG 104 and footnote 2 of Section 25.202(a)(1) 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 these bands 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 these bands.¹⁹ Intelsat satisfies these criteria. The earth stations operating in the 10.95-11.2 GHz and 11.45-11.7 GHz bands served by Intelsat 18 will not transmit in these bands and Intelsat agrees to accept any level of interference into those earth stations from fixed service stations in

¹⁷ See *Intelsat North America Request for Waiver*, File No. SAT-MOD-20050610-00122 (stamp grant with conditions Sept. 30, 2005).

¹⁸ See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int'l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int'l Bur. 1995) (authorizing MSS in the C-band); see also *Application of Motorola Satellite Communications, Inc. for Modification of License*, Order and Authorization, 11 FCC Rcd 13952, 13956 (Int'l Bur. 1996) (authorizing service to fixed terminals in bands allocated to the mobile-satellite service).

¹⁹ *EchoStar 83° Waiver*, ¶ 13.

these bands. Accordingly, the earth stations operating in these bands pose no interference concerns with respect to co-frequency fixed service stations.

Intelsat also agrees to abide by the customer notification requirements that the International Bureau has previously imposed when granting waivers of NG 104 and footnote 2 of Section 25.202(a)(1).²⁰ Intelsat will inform its customers in writing, including any customers receiving end-user services from resellers accessing capacity on Intelsat 18, of the potential for interference from fixed service operations in the 10.95-11.2 GHz and 11.45-11.70 GHz frequency bands.

D. Operational Frequencies

Intelsat 18 will operate in the following C- and Ku-band frequencies:

3700-4200 MHz
5925-6425 MHz
10950-11200 MHz
11450-11700 MHz
12250-12500 MHz
12500-12750 MHz
14000-14500 MHz

Intelsat 701, the satellite that will be replaced by Intelsat 18, operates on the following C- and Ku-band frequencies:

3700-4200 MHz
5925-6425 MHz
10950-11200 MHz
11450-11700 MHz
12500-12750 MHz
14000-14500 MHz

²⁰ See, e.g., *Intelsat North America Request for Waiver*, File No. SAT-MOD-20050610-00122, ¶ 3 (stamp grant with conditions Sept. 30, 2005); *EchoStar 83° Waiver*, ¶ 13.

E. Milestone Demonstration and Request for Bond Reduction

Intelsat 18 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 12250-12500 MHz frequencies are included on Intelsat 18 but are not on the Intelsat 701 satellite it is replacing.²¹

In accordance with Section 25.164(c)-(e) of the Commission's rules,²² Intelsat is providing with this application the following documentation to demonstrate that it has met the first three milestones required of a geostationary satellite:

(1) a confidential copy of its construction contract (along with a request for confidential treatment under Section 0.457 and 0.459 of the FCC's rules)²³;

(2) a signed statement from Susanne Schroll, Intelsat 18 Program Director, Orbital Sciences Corporation, attesting to completion of Critical Design Review and attesting that physical construction of the satellite has commenced;

(3) a signed statement from Jean-Luc Froeliger, Senior Director, Space Systems Acquisition, Intelsat, that as of September 1, 2010, Intelsat has paid to the spacecraft manufacturer, Orbital Sciences Corporation, the payments identified for months 1 through 24 in the Intelsat 18 Payment Schedule, which is Exhibit E dated February 19, 2009 and signed February 25, 2009 to the confidential Fixed Price Contract for the Intelsat 18 (IS 18) Satellite Program Between Orbital Sciences Corporation and Intelsat LLC dated August 4, 2008; and

(4) photographs evidencing that physical construction of the satellite has commenced.

The Commission allows GSO licensees to reduce their bond amounts by 25 percent each time they meet a satellite milestone.²⁴ Accordingly, Intelsat requests that the Commission

²¹ 47 C.F.R. §§ 25.164 and 25.165.

²² 47 C.F.R. § 25.164(c)-(e).

²³ 47 C.F.R. §§ 0.457 and 0.459.

²⁴ 47 C.F.R. § 25.165(d); *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, ¶ 172 (2003); *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Order on Reconsideration and Fifth Report and Order, 19 FCC Rcd 12637, ¶ 48 (2004) (reducing GSO bond requirement to \$3 million but noting that "GSO licensees will

determine that the first three milestones for Intelsat 18 have been satisfied and reduce the \$3,000,000 bond amount by 75 percent to \$750,000.

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 replacement satellite, it will generally authorize the replacement satellite at the same location.²⁵

In this case, Intelsat holds a replacement expectancy for the 180.0° E.L. orbital location because the Commission authorized Intelsat to operate Intelsat 701 at that location.²⁶ As demonstrated in the attached Engineering Statement and FCC Form 312, Schedule S, Intelsat 18 is technically consistent with Intelsat 701.²⁷

continue to be allowed to reduce their bond amount by 25 percent each time they meet a milestone.”); *Star One S.A., Petition for Declaratory Ruling to Add the Star One C1 Satellite a 65° W.L. to the Permitted Space Station List*, 19 FCC Rcd 16334, ¶ 15 (Int’l Bur. 2004) (“Licensees may reduce the amount of the bond upon meeting each milestone.”).

²⁵ *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)).

²⁶ *See supra n. 2.*

²⁷ *Amendment of the Commission's Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760 ¶ 257 (2003) (“We do not require replacement satellites to be technically ‘identical’ to the existing satellite. We recognize that next-generation satellites will incorporate satellites with technical advancements made since the previous generation satellite was launched. We do not intend to change this policy, which facilitates state-of-the-art systems. Rather, we will continue to assess only whether operations of the replacement satellite will be consistent with our international coordination obligations pursuant to regulations promulgated by the International Telecommunication Union.”) (internal citations omitted).

In addition, grant of this application will serve the public interest by ensuring continuity of service to U.S. consumers from the nominal 180.0° E.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 180.0° E.L. orbital location before Intelsat 701 reaches the end of its useful life or is relocated, and, as noted above, has made concrete steps toward constructing Intelsat 18.

The Commission has stated that granting replacement applications ensures that service will be provided to U.S. 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.²⁸ Moreover, Intelsat 18 will also offer capacity in additional frequencies to customers at the 180.0° E.L. orbital location. These additional frequencies also serve the public interest.

III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Intelsat 18 at 180.0° E.L., with the exception of the bands 12250-12500 MHz, 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

²⁸ 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.”).

the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.²⁹

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.³⁰

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 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. 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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October 13, 2010

²⁹ 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-MSC -20060710-00076, Order of Modification, 23 FCC Rcd 2764, 2769-71 (¶¶11-13)(Int'l Bur. 2008).

³⁰ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

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:

4 rue Albert Borschette
L-1246 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: 4 rue Albert Borschette, L-1246 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*”).