

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 27, a Replacement Satellite With New Frequencies, at 55.5° W.L.

File No. SAT-RPL- _____

**APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE
INTELSAT 27, A REPLACEMENT SATELLITE WITH NEW
FREQUENCIES, AT 55.5° W.L.**

Intelsat License 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 27, at the 55.5° W.L. (304.5° E.L.) orbital location. Intelsat 27 also will carry a UHF payload that will operate in non-commercial frequencies. Intelsat 27 is scheduled for launch in the fourth quarter of 2012 or first quarter of 2013 and, after traffic transition, will replace the Intelsat 805 satellite (call sign S2404), which is currently operating at 55.5° W.L.² Intelsat 27 will operate on a non-common carrier basis.³

¹ 47 C.F.R. § 25.114.

² See *Intelsat LLC, Application to Modify Authorization for INTELSAT 805 to Allow the Provision of Fixed-Satellite Service Between Non-U.S. Points in the 12.7-12.75 GHz Frequency Band*, Order and Authorization, 19 FCC Rcd 2775 (2004) (“Intelsat 805 Authorization”). During traffic transition, Intelsat 805 and Intelsat 27 will occupy the same station-keeping box. Following traffic transition, and subject to receipt of FCC approval, Intelsat 805 will be redeployed to a different location. Intelsat will file an application to relocate the Intelsat 805 satellite as soon as possible after determining a redeployment plan that best meets customer needs.

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 customers at the 55.5° W.L. orbital location, adding new Ku-band capacity at the location, as well as providing UHF capacity for U.S. Government and allied government 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. 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

³ Section 310(b) is not applicable to this license because Intelsat 27, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis. *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).

⁴ 47 C.F.R. § 25.114(c).

⁵ *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, FCC 06-85, ¶ 23 (rel. June 19, 2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

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

C. Waiver Requests

Intelsat requests waiver of the following technical rules: (1) Section 25.210(a)(3), which requires the capability of switching polarization upon ground command for operation in the 4/6 GHz frequency bands; and (2) Section 25.202(a)(1), which lists the frequency bands which are available for use by the fixed-satellite service. 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 25.210(a)(3)

Intelsat requests a waiver of Section 25.210(a)(3) of the Commission's rules, which requires a space station that provides domestic service using the frequency bands 3700 – 4200

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

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.

MHz and 5925 – 6425 MHz bands to be capable of switching polarization upon ground command. The Commission previously granted a waiver of Section 25.210(a)(3) for the Intelsat 805 satellite at the 55.5° W.L. orbital location.¹⁰ The nearest co-frequency satellites adjacent to Intelsat 27 are Intelsat 707, located at 53.0° W.L., Intelsat 9, located at 58.0° W.L, and Intelsat 16, located at 58.1° W.L. Intelsat 707, Intelsat 16, and Intelsat 9 are all licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 27 in order to ensure that excessive levels of interference are not generated. Accordingly, there is good cause for waiver in this case.

2. Request for Waiver of Section 25.202(a)(1)

Intelsat also requests that the waiver of Section 25.202(a)(1), which previously was granted by the Commission for the operation of Intelsat 805 in the band 12700-12750 MHz, be extended to the operation of Intelsat 27 in the same band.¹¹ Like the Intelsat 805 satellite, Intelsat will not offer service to the United States in this band. Intelsat seeks to use this band to offer service to Peru, Ecuador, Colombia, Venezuela, Panama, Costa Rica, Nicaragua, El Salvador, Honduras, Guatemala, Belize and Mexico. There is good cause for grant of the requested waiver because Intelsat seeks to continue serving customers in some of the above listed countries that have been provided service from the Intelsat 805 satellite, as well as to serve customers in additional countries. Furthermore, grant of this waiver will not cause harmful interference. Intelsat will operate in conformance with the technical parameters provided in the

¹⁰ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, at Appendix A, Table 1 (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

¹¹ See Intelsat 805 Authorization.

Intelsat 805 application and incorporates by reference the technical information, including the interference studies, that were provided for the Intelsat 805 satellite.¹² Further, Intelsat accepts that the conditions placed on Intelsat’s operations in the 12700-12750 MHz band for the Intelsat 805 satellite will continue to apply to the Intelsat 27 satellite.¹³

D. Operational Frequencies

The following chart shows the frequencies that will be used by the Intelsat 27 satellite at 55.5° W.L. and the frequencies that are currently used by the Intelsat 805 satellite at 55.5° W.L.

Frequency Range	Intelsat 27	Intelsat 805
3400-3700 MHz		X
3700-4200 MHz	X	X
5850-5925 MHz		X
5925-6425 MHz	X	X
6425-6650 MHz		X
11450-12200 MHz	X	
12500-12750 MHz	X	X
14000-14250 MHz	X	X
14250-14500 MHz	X	
243.52 - 268.16 MHz	X	
292.835-317.33 MHz	X	

All of the existing frequencies licensed on Intelsat 805 except for the 3400-3700 MHz, 5850-5925 MHz and 6425-6650 MHz band are also on Intelsat 27. In addition, Intelsat 27 contains

¹² *Intelsat LLC, Application to Modify Authorization for INTELSAT 805 to Allow the Provision of Fixed-Satellite Service Between Non-U.S. Points in the 12.7-12.75 GHz Frequency Band, SAT-MOD-20020919-00178* (filed Sept. 19, 2002).

¹³ See Intelsat 805 Authorization ¶ 11.

new frequencies at 11450-12200 MHz, 14250-14500 MHz, 243.52 - 268.16 MHz, and 292.835-317.33 MHz¹⁴ that are not on the Intelsat 805 satellite. Moreover, Intelsat will operate the 12500-12700 MHz frequencies pursuant to the ITU filings of the United Kingdom,¹⁵ and operation in the 12700-12750 MHz band will be conducted on a non-interference basis under Article 4.4 of the ITU Radio Regulations.¹⁶ The 243.52 - 268.16 MHz and 292.835-317.33 MHz UHF frequencies will be coordinated, as appropriate, through NTIA consistent with U.S. Government requirements.

E. Milestone Demonstration and Request for Bond Reduction

Intelsat 27 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 11450-12200 MHz and 14250-14500 MHz frequencies are included on Intelsat 27 but are not on the Intelsat 805 satellite it is replacing.¹⁷

In accordance with Section 25.164(c)-(e) of the Commission's rules,¹⁸ 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 rules¹⁹);

¹⁴ Under note G100 of Section 2.106 of the Commission's rules, 47 C.F.R. § 2.106, note G100, the 243.52 - 268.16 MHz and 292.835-317.33 MHz frequency bands are not allocated for commercial use but are limited for use by the United States military for mobile satellite service applications. Accordingly, the Intelsat 27 UHF frequencies will be used only to provide mobile satellite service to U.S. Government and allied governments.

¹⁵ Intelsat will provide a letter from Ofcom confirming that Intelsat may operate Intelsat 27 pursuant to the filings of the U.K.

¹⁶ ITU Radio Regulations, Art. 4.4 (2008).

¹⁷ 47 C.F.R. §§ 25.164 and 25.165.

¹⁸ 47 C.F.R. § 25.164(c)-(e).

¹⁹ 47 C.F.R. §§ 0.457 and 0.459.

(2) a signed statement from Michael Neuman, Intelsat-4 Pack Contract Program Director, Boeing Satellite Systems, 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 June 1, 2011, Intelsat actually paid 43% of the pre-launch commitments to the spacecraft manufacturer, Boeing Satellite Systems; and

(4) a photograph 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.²⁰ Accordingly, Intelsat requests that the Commission determine that the first three milestones for Intelsat 27 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.²¹

²⁰ 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 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.”).

²¹ *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*

In this case, Intelsat holds a replacement expectancy for the 55.5° W.L. orbital location because the Commission authorized Intelsat to operate Intelsat 805 at that location.²² As demonstrated in the attached Engineering Statement and FCC Form 312, Schedule S, Intelsat 27 is technically consistent with Intelsat 805.²³

In addition, grant of this application will serve the public interest by ensuring continuity of service to consumers from the nominal 55.5° W.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 55.5° W.L. orbital location before Intelsat 805 reaches the end of its useful life or is relocated, and, as noted above, has made concrete steps toward constructing Intelsat 27.

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 Moreover, Intelsat 27 will also offer

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)).

²² See Intelsat 805 Authorization.

²³ *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).

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.”).

expanded capacity to customers at the 55.5° W.L. orbital location. This expansion of capacity also serves the public interest.

Furthermore, Intelsat's inclusion of the UHF hosted payload is in the public interest and in support of critical national security requirements. The Navy, in a recent report to Congress on the status of the current UHF fleet stated: "... the delay in delivery of the MUOS system, coupled with the fragility of the current UHF fleet satellite constellation, placed continued availability of sufficient UHF satellite communications necessary to meet the warfighter's needs at risk."²⁵ Additionally, in Congressional testimony last year, Vice Admiral David J. Dorsett, Deputy Chief of Naval Operations for Information Dominance (N2/N6) and Director of Naval Intelligence, stated "the approach that we are taking now, by looking at a commercially hosted payload, is the right approach. It reduces the risk that we otherwise would have."²⁶

III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Intelsat 27 at 55.5° W.L., with the exception of the 11450-12200, 14250-14500, 243.52 - 268.16 MHz, and 292.835-317.33 MHz frequencies, 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

²⁵ *Ultra High Frequency (UHF) Augmentation and Constellation Sustainment Plan*, U.S. Navy Report to Congress, 2 (March 2010).

²⁶ *Department of Defense Authorization for Appropriations for Fiscal Year 2011*, S. Hrg. 111-701 Pt. 7, Hearing on S.3454 Before the Senate Committee on Armed Services, (Mar. 10, 2010) (testimony of VADM David J. Dorsett, U.S. Navy), available at <http://www.gpo.gov/fdsys/pkg/CHRG-111shrg62160/pdf/CHRG-111shrg62160.pdf>.

of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.²⁷

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.²⁸

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. 11.45-11.70 GHZ FREQUENCY BAND

Intelsat understands that operations in the 11.45-11.70 GHz frequency band are subject to certain limitations and obligations, which Intelsat accepts and will fulfill. Specifically, for operations in the 11.45-11.70 GHz frequency band, Intelsat accepts the following conditions:

- Intelsat's use of the 11450-11700 MHz band (space-to-Earth) is subject to 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, consistent with footnote US74.
- The operation of the Intelsat 27 space station in the 11450-11700 MHz band (space-to-Earth) is limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

²⁷ 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).

²⁸ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

VI. CONCLUSION

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

Respectfully submitted,

/s/ Susan H. Crandall

Susan H. Crandall
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June 10, 2011

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

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”) (f/k/a Intelsat North America LLC), in the *Intelsat-Serafina Order*.²⁹ In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.³⁰ There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

²⁹ *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).

³⁰ *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).

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

Intelsat License LLC (“Intelsat”) (f/k/a Intelsat North America LLC), has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to Intelsat’s former affiliate, PanAmSat Licensee Corp. (“PanAmSat”),³¹ based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.³² 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.

³¹ 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).

³² 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:

Michael McDonnell, Chairman
Flavien Bachabi, Deputy Chairman
Phillip Spector, Secretary
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell
Flavien Bachabi
Phillip Spector

The 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 Subsidiary Holding Company S.A., a Luxembourg company. Intelsat Subsidiary Holding Company S.A. is wholly owned by Intelsat Phoenix Holdings S.A., a Luxembourg company. Intelsat Phoenix Holdings 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*”).