

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 34, a Replacement Satellite With New Frequencies, at 55.5° W.L.

File No. SAT-RPL- _____

**APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE
INTELSAT 34, 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 34, at the 55.5° W.L. (304.5° E.L.) orbital location. Intelsat 34 is scheduled for launch in the third quarter of 2015 and, after traffic transition, will replace the Intelsat 805 satellite (call sign S2404), which currently is operating at 55.5° W.L.,² and the Galaxy 11 satellite (call sign S2253), which currently is operating at 55.6° W.L.³ Intelsat 34 will operate on a non-common carrier basis.⁴

¹ 47 C.F.R. § 25.114.

² 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) and *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”).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00979, File No. SAT-STA-20130829-00109 (Nov. 8, 2013) (Public Notice); see also *Application of PanAmSat Licensee*

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 and adding new Ku-band capacity at the location. 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 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

Corp. to Modify Authorization for Galaxy 11, File No. SAT-MOD-20101102-00229 (filed Nov. 2, 2010, stamp grant March 8, 2011) ("Galaxy 11 Authorization"). During traffic transition, Intelsat 805 and Intelsat 34 will occupy the same station-keeping box. Following traffic transition, and subject to receipt of FCC approval, Intelsat 805 and Galaxy 11 will be redeployed to different locations. Galaxy 11 will be redeployed to 44.8° W.L. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00918, File No. SAT-MOD-20121018-00184 (Dec. 14, 2012) (Public Notice). *See also* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Mar. 14, 2013) (noting that the redeployment of Galaxy 11 to 44.8° W.L. would be delayed until the launch of Intelsat 34 (f/k/a Intelsat 27R)). 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.

⁴ Section 310(b) is not applicable to this license because Intelsat 34, 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).

⁵ 47 C.F.R. § 25.114(c).

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 on Intelsat’s compliance with the Commission’s orbital debris mitigation rules.⁷

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(g), which requires satellite operators to conduct TT&C at either or both edges of the allocated band. Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”⁸ 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.⁹ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship,

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, FCC 06-85, ¶ 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 11,567 (2004).

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

⁹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

equity, or more effective implementation of overall policy.”¹⁰ 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 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.¹¹ The nearest co-frequency satellites adjacent to Intelsat 34 are Intelsat 23, located at 53.0° W.L.; and Intelsat 21, located at 58.0° W.L. Intelsat 23 and Intelsat 21 are licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 34 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(g)

Intelsat also requests waiver of Section 25.202(g), which requires satellite operators to conduct TT&C at either or both edges of the allocated band.¹² Intelsat seeks to operate the Intelsat 34 command functions on two independent PCM/PSK signals using the 6173.7 MHz and 6176.3 MHz frequencies and to operate the Intelsat 34 telemetry functions on two independent, linearly polarized, PCM/PSK signals on one of two frequency pairs: 3949.0/3949.5 MHz or 3950.5/3951.0 MHz. The Intelsat 34 command and telemetry frequencies are similar to those utilized by Intelsat 805, one of the spacecraft that Intelsat 34 is replacing. As explained more fully on page 9 and in Exhibits 7 & 8 of the attached Engineering Statement, operation of Intelsat

¹⁰ *WAIT Radio*, 418 F.2d at 1159.

¹¹ *See* Intelsat 805 Authorization, 15 FCC Rcd 15460, at Appendix A, Table 1.

¹² 47 C.F.R. § 25.202(g).

34's TT&C functions will not cause harmful interference to other satellite operators. The nearest co-frequency satellites adjacent to Intelsat 34 are Intelsat 23, located at 53.0° W.L.; and Intelsat 21, located at 58.0° W.L.;— both of which are licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 34 in order to ensure that excessive levels of interference are not generated.

Intelsat recognizes that the requested waiver of Section 25.202(g) is not routinely granted and does not intend to relocate the Intelsat 34 satellite to an orbital location serving the United States that was not transferred to Intelsat upon privatization.¹³ This waiver is intended to eliminate unnecessary earth station modifications and associated expenses for existing Intelsat customers that will be transitioning services to the Intelsat 34 satellite when it replaces Intelsat 805 at the 55.5° W.L. orbital location. Finally, Intelsat agrees to accept as a condition a requirement to accommodate future space station networks that are compliant with Section 25.202(g) and to operate Intelsat 34 pursuant to any existing or future coordination agreements for this location.¹⁴

D. Operational Frequencies

The following chart shows the frequencies that will be used by the Intelsat 34 satellite at 55.5° W.L. and the frequencies that are currently used by the Intelsat 805 and Galaxy 11 satellites at 55.5° W.L.

¹³ See *Petition of the International Telecommunications Satellite Organization under Section 316 of the communications Act, as Amended*, DA 08-444 (Feb. 21, 2008) (identifying orbital locations transferred to Intelsat upon privatization).

¹⁴ These conditions are consistent with those applied to the Intelsat New Dawn satellite, which received a waiver of Section 25.202(g) of the rules. See *Application to Launch and Operate Replacement Satellite New Dawn at 32.8 E.L.*, File Nos. SAT-LOA-20080509-00101 and SAT-AMD-20081205-00223 (stamp grant with conditions Jan. 9, 2009).

Frequency Range	Intelsat 34	Intelsat 805	Galaxy 11
3400-3700 MHz		X	
3700-4200 MHz	X	X	X
5850-5925 MHz		X	
5925-6425 MHz	X	X	X
6425-6650 MHz		X	
10950-11200 MHz			X
11450-11700 MHz	X		
11700-12200 MHz	X		X
12500-12750 MHz		X	
13750-14000 MHz			X
14000-14250 MHz	X	X	X
14250-14500 MHz	X		X

All of the existing frequencies licensed on Intelsat 805 and Galaxy 11, except for the 3400-3700 MHz, 5850-5925 MHz, 6425-6650 MHz, 10950-11200 MHz, 12500-12750, and 13750-14000 MHz bands, are also on Intelsat 34. In addition, Intelsat 34 contains new frequencies at 11450-11700 MHz that are not licensed on the Intelsat 805 or Galaxy 11 satellites.

E. Milestone Demonstration and Request for Bond Reduction

Intelsat 34 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 11450-11700 MHz frequencies are included on Intelsat 34, but are not on the Intelsat 805 or Galaxy 11 satellites it is replacing.¹⁵

¹⁵ 47 C.F.R. §§ 25.164 and 25.165.

In accordance with Section 25.164(c)-(e) of the Commission's rules,¹⁶ Intelsat is providing with this application the following documentation to demonstrate that it has met the first milestone required of a geostationary satellite: 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 rules¹⁷).

The Commission allows GSO licensees to reduce their bond amounts by 25 percent each time they meet a satellite milestone.¹⁸ Accordingly, Intelsat requests that the Commission determine that the first milestone for Intelsat 34 has been satisfied and reduce the \$3,000,000 bond amount by 25 percent to \$2,250,000.

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

¹⁶ 47 C.F.R. § 25.164(c)-(e).

¹⁷ 47 C.F.R. §§ 0.457 and 0.459.

¹⁸ 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 CI 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.").

replacement satellite, it will generally authorize the replacement satellite at the same location.¹⁹

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 and Galaxy 11 at that location.²⁰ As demonstrated in the attached Engineering Statement, FCC Form 312, and Schedule S, Intelsat 34 is technically consistent with Intelsat 805 and Galaxy 11.²¹

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 and Galaxy 11 reach the end of their useful life or are relocated, and, as noted above, has taken a concrete step toward constructing Intelsat 34.

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

¹⁹ *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)).

²⁰ See Intelsat 805 Authorization; see also Galaxy 11 Authorization.

²¹ *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).

replacement satellite in the shortest possible time.²² Moreover, Intelsat 34 will also offer expanded Ku-band capacity to customers at the 55.5° W.L. orbital location. This expansion of capacity also serves the public interest.

III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Intelsat 34 at 55.5° W.L., with the exception of the 11450-12200 and 14250-14500 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 of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.²³

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.²⁴

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

²² 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.”).

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

²⁴ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

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 34 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).

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
Associate General Counsel
Intelsat Corporation

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

January 14, 2014

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*.²⁵ In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.²⁶ There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

²⁵ *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).

²⁶ *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”),²⁷ based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.²⁸ 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.

²⁷ 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).

²⁸ 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
Michelle Bryan, Secretary
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell
Flavien Bachabi
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 consummated.