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Received

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February 9, 2005

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RECEIVED

FEB - 9 2005

Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Supplemental Submission*
Intelsat, Ltd., Petition for Declaratory Ruling that Intelsat, Ltd. Complies
with Section 621(5)(F) of the ORBIT Act
File No. SAT-PDR-20041228-00231; IB Docket No. 05-18

Dear Ms. Dortch:

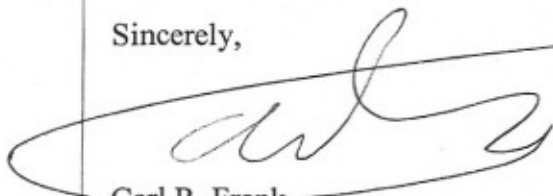
Intelsat, Ltd. ("Intelsat"), by its attorneys, hereby submits a supplement to its Petition for Declaratory Ruling that Intelsat, Ltd. Complies with Section 621(5)(F) of the ORBIT Act (and its attached Certification of Intelsat, Ltd.), which was filed on December 23, 2004. Specifically, Intelsat updates its Certification to reflect the consummation of Intelsat's transaction with Zeus Holdings Limited, in accordance with the FCC order (DA 04-4034).

Importantly, this certification is *identical* to the one filed, at FCC staff's request, on January 6, 2005. The prior certification was filed before FCC Public Notice of the instant Petition. Thus the attached certification adds *no* new material and thus *no* additional Public Notice of this supplement could be required.

Wiley Rein & Fielding LLP

Marlene Dortch
February 9, 2005
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Sincerely,

A handwritten signature in black ink, appearing to read 'C. Frank', is written over a large, thin, horizontal oval scribble.

Carl R. Frank
Counsel to Intelsat, Ltd.

Enclosure

cc: Roderick Porter
JoAnn Lucanik
Marilyn Simon
Louise Klees-Wallace
Neil Dellar

CERTIFICATION OF INTELSAT, LTD.

I, Conny L. Kullman, Chief Executive Officer of Intelsat, Ltd. ("Intelsat"), hereby file this further certification in support of Intelsat, Ltd.'s Petition for Declaratory Ruling. This certification reflects the fact that the Zeus transaction has closed, in accordance with the application previously granted by the Commission. I declare under penalty of perjury as follows:

(i) Intelsat has achieved substantial dilution of the aggregate amount of former signatory financial interest in Intelsat;

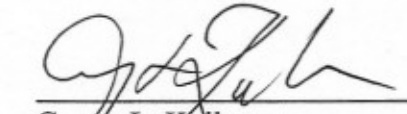
(ii) Any signatories or former signatories that retain a financial interest in Intelsat do not possess, together or individually, effective control of Intelsat;

(iii) No intergovernmental organization has any ownership interest in a successor entity of Intelsat; and

(iv) I have read the foregoing Petition for Declaratory Ruling that Intelsat, Ltd. Complies with Section 621(5)(F) of the ORBIT Act. The representations contained therein are true and correct.

Intelsat, Ltd.

By:



Conny L. Kullman
Chief Executive Officer of Intelsat, Ltd.

Executed on: February 8, 2005