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FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Telesat Canada, Petition for Declaratory Ruling,
File No. SAT-LOI-20161115-00108**

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules,¹ Telesat Canada ("Telesat") hereby notifies the Commission that it has undergone a *pro forma* transfer of control.

The *pro forma* transfer of control is the result of a corporate restructuring.² Prior to the corporate restructuring, Telesat had two holding companies above it in its corporate structure. Telesat was a wholly owned subsidiary of Telesat Interco Inc. which, in turn, was a wholly owned subsidiary of Telesat Holdings Inc. ("Telesat Holdings"). As a result of the corporate restructuring, the former shareholders of Telesat Holdings became direct shareholders of Telesat, having the same interests and the same voting rights as they had held previously in Telesat Holdings.³ The transfer of control, therefore, was entirely *pro forma*; there was no change in ultimate control.

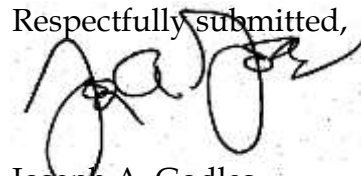
¹ 47 C.F.R. § 1.65).

² The restructuring occurred on January 1, 2017, and due to an oversight was not reported within 30 days. To the extent required, Telesat hereby requests a waiver of the time for reporting requirements that are stated in Section 1.65.

³ This restructuring was accomplished by merging Telesat Holdings and Telesat Interco into a new entity that was merged with Telesat.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Godles', with a stylized flourish at the end.

Joseph A. Godles
Attorney for Telesat Canada