

**Attachment 1:  
Responsive to Questions 34, 36, 40, and 42a**

**I. FOREIGN OWNERSHIP – RESPONSIVE TO QUESTION 34**

The Commission previously approved the foreign ownership in Intelsat North America LLC (“Intelsat North America”) in the *Intelsat-Serafina Order*.<sup>1</sup> In December 2009, the Commission also approved the *pro forma* changes in Intelsat North America’s foreign ownership that are the subject of this request to update the ownership of the Galaxy 23 satellite (call sign S2592) on the Permitted Space Station List.<sup>2</sup> There have been no other material changes to Intelsat North America’s foreign ownership since this foreign ownership was approved in the *Intelsat-Serafina Order*.

**II. CANCELLED AUTHORIZATIONS – RESPONSIVE TO QUESTION 36**

Intelsat North America has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to Intelsat North America’s affiliate, PanAmSat Licensee Corp. (“PanAmSat”), based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>3</sup> 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 North America 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 North America’s basic qualifications, which are well-established and a matter of public record.

**III. OFFICERS, DIRECTORS AND TEN PERCENT OR GREATER SHAREHOLDERS – RESPONSIVE TO QUESTION 40**

Following are the officers of Intelsat North America LLC:

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<sup>1</sup> *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*”).

<sup>2</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00652, DA 09-2538 (rel. Dec. 4, 2009).

<sup>3</sup> *See PanAmSat Licensee Corp.*, Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).

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 NA officers is:

23 avenue Monterey  
L-2086 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”). Intelsat Global, S.A.’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference.<sup>4</sup>

#### **IV. NOTIFICATION OF TRANSFER OF CONTROL OF PERMITTED SPACE STATION LIST SATELLITE – RESPONSIVE TO QUESTION 42A**

Intelsat North America, pursuant to the *Satellite Licensing Streamlining Order*<sup>5</sup> and Section 25.137(g) of the Commission’s rules,<sup>6</sup> hereby notifies the Commission of a *pro forma* change in ownership. Intelsat North America is the owner of the C-band portion of Galaxy 23 (formerly Intelsat Americas 13), an in-orbit satellite licensed by Papua New Guinea located at 121° W.L., with the call sign S2592. The Federal Communications Commission added Galaxy

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<sup>4</sup> See *supra* note 1.

<sup>5</sup> See *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, at ¶¶ 326-27 (2003) (“*Satellite Licensing Streamlining Order*”).

<sup>6</sup> 47 C.F.R. §25.137(g).

23 (then named Telstar 13) to the Permitted Space Station List (“Permitted List”) with conditions on August 8, 2003,<sup>7</sup> and subsequently approved a change in ownership of Galaxy 23 from Loral SpaceCom Corporation to Intelsat North America on July 16, 2004.<sup>8</sup>

The Commission recently authorized the *pro forma* transfer of control of various licenses and authorizations held by the subsidiaries of Intelsat to Intelsat Global, S.A. (Luxembourg).<sup>9</sup> This *pro forma* transfer of control was consummated effective December 15, 2009.<sup>10</sup> Through this transaction, Intelsat Global, S.A. (Luxembourg) became the indirect 100 percent owner of Intelsat North America.

As depicted in Exhibit 1, Intelsat North America was owned and controlled through various directly and indirectly wholly-owned subsidiaries of Intelsat Global, Ltd., a Bermuda entity. These subsidiaries include the following Bermuda entities, each of which was an indirect parent of Intelsat North America: Intelsat Global Subsidiary, Ltd.; Intelsat Holdings, Ltd.; Intelsat, Ltd.; Intelsat (Bermuda), Ltd.; Intelsat Jackson Holdings, Ltd.; Intelsat Intermediate Holding Company, Ltd. and Intelsat Subsidiary Holding Company, Ltd. (together with Intelsat Global, Ltd., the “Bermuda Entities”). Each of these Bermuda Entities was migrated to and reorganized as a Luxembourg entity, becoming respectively: Intelsat Global, S.A.; Intelsat Global Subsidiary, S.A.; Intelsat Holdings, S.A.; Intelsat, S.A.; Intelsat (Luxembourg), S.A.; Intelsat Jackson Holdings, S.A.; Intelsat Intermediate Holding Company, S.A. and Intelsat Subsidiary Holding Company, S.A. (collectively, the “Luxembourg Entities”). In connection with this migration, Intelsat (Bermuda), Ltd. changed its name to Intelsat (Luxembourg), S.A. The migration of the Bermuda Entities effected a *pro forma* transfer of control of Intelsat North America. The migration did not affect the assets held by Intelsat North America or its ultimate ownership and control. It was merely a change in corporate form and jurisdiction of organization. The post-consummation holding structure for Intelsat North America is illustrated in Exhibit 2. Consistent with the Commission’s rules, Intelsat North America will continue to operate Galaxy 23 in accordance with the conditions of the original order adding Galaxy 23 to the Permitted List<sup>11</sup> unless otherwise notified by the Commission.<sup>12</sup>

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<sup>7</sup> *Loral SpaceCom Corp., Petition for Declaratory Ruling to Add Telstar 13 to the Permitted Space Station List*, Order, 18 FCC Rcd. 16374 (2003) (*Loral SpaceCom Petition*”).

<sup>8</sup> *Satellite Policy Branch Information*, Public Notice, Report No. SAT-00227 (rel. July 16, 2004).

<sup>9</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00652, DA 09-2538 (rel. Dec. 4, 2009).

<sup>10</sup> *See* Letter from Jennifer D. Hindin to Marlene H. Dortch, 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, SES-T/C-20091125-01503, 0004042061 (filed Jan. 4, 2010).

<sup>11</sup> *See Loral SpaceCom Petition* at ¶ 31.

Intelsat North America recognizes that for transfers of control of Permitted List satellites, the Commission has indicated that it would issue a public notice “announcing that the transaction has taken place, and inviting comment on whether the transaction affects any of the considerations made when the original satellite operator was allowed to enter the U.S. market.”<sup>13</sup> However, this notification is for a *pro forma* transfer of control, and the Commission does not generally issue a public notice seeking comments on applications for *pro forma* transfers of control.<sup>14</sup> Intelsat North America therefore requests that the Commission grant the requested *pro forma* transfer of control of Galaxy 23 on the Permitted List without issuing a public notice requesting comment.

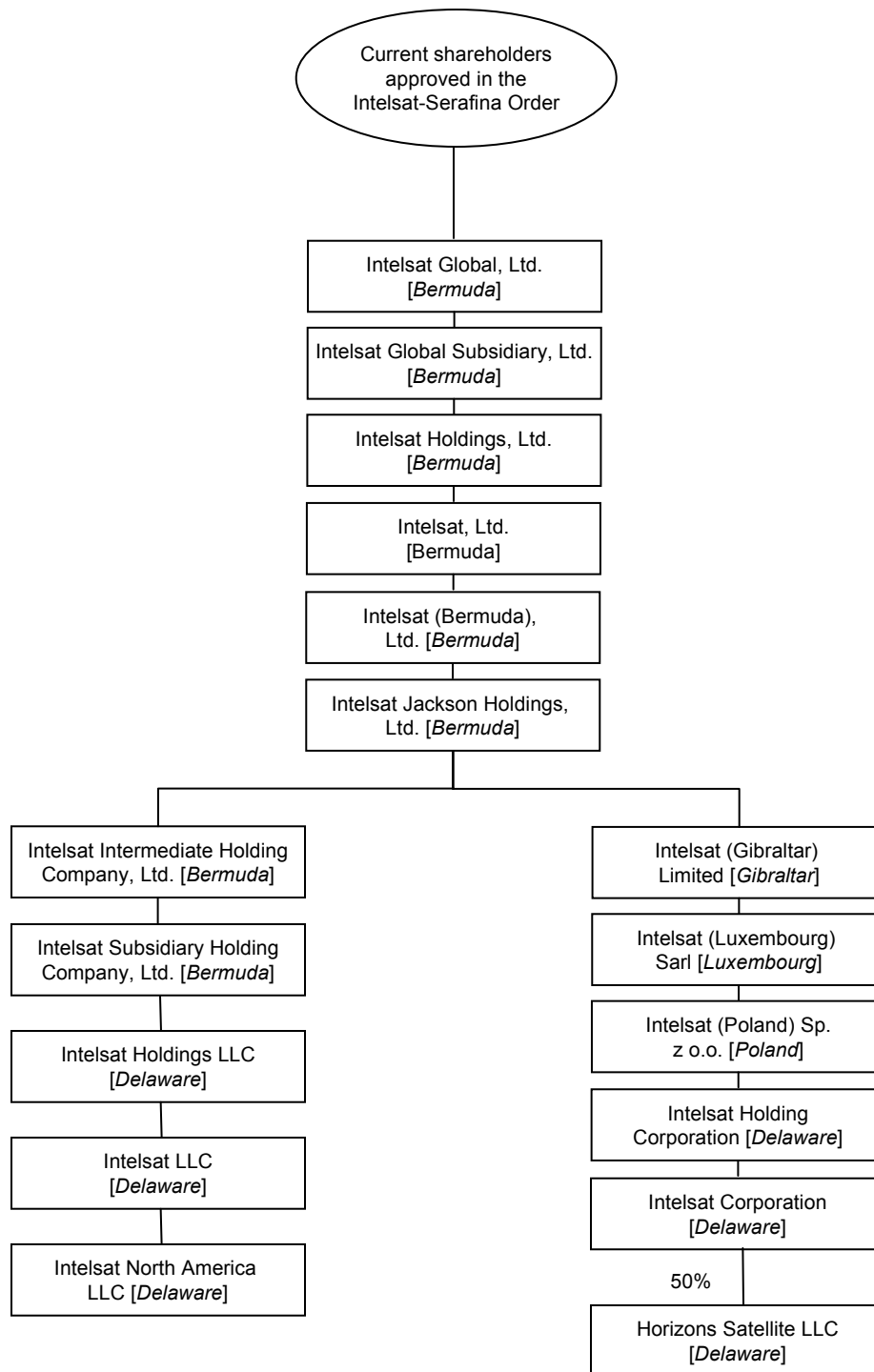
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<sup>12</sup> See *Satellite Licensing Streamlining Order* at ¶ 327 (“Permitted List satellites that have been transferred to new owners may continue to provide service in the United States unless and until the Commission determines otherwise.”).

<sup>13</sup> *Id.* at ¶ 326.

<sup>14</sup> See 47 C.F.R. § 25.151(c)(5).

## Exhibit 1



## Exhibit 2

