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FILED ELECTRONICALLY

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

**Re: Telesat Brasil Capacidade de Satelites Ltda. , Pro
Forma Transfer of Control of Non-U.S. Licensed
Operator of Space Station Estrela du Sul 2,
Call Sign S2821, File No. SAT-PPL-20110112-00012**

Dear Ms. Dortch:

Pursuant to Section 25.137(g) of the Commission's rules,¹ Telesat Brasil Capacidade de Satelites Ltda. ("Telesat Brasil"), the operator of the non-U.S. licensed satellite identified above that has been authorized to serve the United States, 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, several layers up in its corporate chain, Telesat Brasil had two additional holding companies above it in its corporate structure. Telesat Canada, which through other entities holds over 99% of the equity of Telesat Brasil, was a wholly owned subsidiary of Telesat Interco Inc. which, in turn, was a wholly owned

¹ 47 C.F.R. § 25.137(g).

² The restructuring occurred on January 1, 2017, and due to an oversight was not reported within 30 days. To the extent required, Telesat Brasil hereby requests a waiver of the time for reporting requirements that are stated in Section 25.137(g).

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 Canada, having the same interests and the same voting rights as they had held previously in Telesat Holdings.³ There was no change in Telesat Canada's interests, through intermediate entities, in Telesat Brasil. The transfer of control, therefore, was entirely *pro forma*; there was no change in ultimate control.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Godles', written over a light grey circular stamp.

Joseph A. Godles

Attorney for Telesat Brasil Capacidade de Satelites Ltda.

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