

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT LLP
1025 CONNECTICUT AVENUE, N.W., SUITE 1000
WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER
DEVENDRA ("DAVE") KUMAR

HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

THOMAS S. TYCZ*
SENIOR POLICY ADVISOR
*NOT AN ATTORNEY

(202) 429-4900
TELECOPIER:
(202) 429-4912
e-mail:
jgodles@g2w2.com
website: www.g2w2.com

March 22, 2017

FILED ELECTRONICALLY

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

**Re: Telesat International Limited. , Pro Forma
Transfer of Control of Non-U.S. Licensed
Operator of Space Station T19V, Call Sign S2955,
File No. SAT-PPL-20160225-00020**

Dear Ms. Dortch:

Pursuant to Section 25.137(g) of the Commission's rules,¹ Telesat International Limited ("Telesat International"), 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 International 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 subsidiary of Telesat Holdings Inc. ("Telesat Holdings"). As a result of

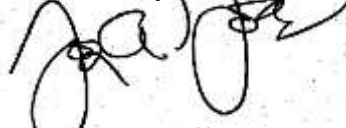
¹ 47 C.F.R. § 25.137(g).

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

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 International. 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', with a stylized flourish at the end.

Joseph A. Godles

Attorney for Telesat International Limited

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