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DA 07-3972

Released: September 19, 2007

INTELSAT HOLDINGS, LTD., TRANSFEROR, AND SERAFINA HOLDINGS LIMITED, TRANSFEREE, SEEK FCC CONSENT TO TRANSFER CONTROL OF LICENSES AND AUTHORIZATIONS

IB Docket No. 07-181

PLEADING CYCLE ESTABLISHED

Petitions Due: October 19, 2007
Oppositions Due: November 5, 2007
Replies Due: November 13, 2007

I. INTRODUCTION

Intelsat Holdings, Ltd. ("Intelsat" or "Transferor") and Serafina Holdings Limited ("Serafina" or "Transferee" and, together with Intelsat, the "Applicants") have filed a series of applications pursuant to sections 214, 308 and 310(d) of the Communications Act of 1934, as amended, and sections 1.948(a), 25.119, and 63.24 of the Commission's rules. The Applicants seek approval to transfer control of Intelsat and six subsidiaries of Intelsat – Intelsat LLC, Intelsat North America LLC, Intelsat General Corporation, Intelsat USA License Corp., PanAmSat Licensee Corp., and PanAmSat H-2 Licensee Corp. (together, the "Intelsat Licensees") – from Intelsat's existing control group of four private equity firms ("Existing Control Group" or "Existing Shareholders") to Serafina, a newly-formed Bermuda company

¹ 47 U.S.C. §§ 214, 308, 310(d), 47 C.F.R. §§ 1.948(a), 25.119, 63.24. Associated with each of the fourteen transfer of control applications, the Applicants have submitted a narrative pleading seeking approval of the joint applications. Intelsat Holdings, Ltd., Transferor, and Serafina Holdings Limited, Transferee, Consolidated Application for Consent to Transfer Control of Holders of Title II and Title III Authorizations, IB Docket No. 07-181 ("Consolidated Application"). The Consolidated Application also asks that the grant of the Applications "include authority for Serafina to acquire control with respect to: (i) all licenses and authorizations issued or assigned to Intelsat or any of its subsidiaries during the pendency of the Applications and prior to the consummation of any approved transaction; and (ii) all applications pending at the time of consummation of the [proposed transaction]." Consolidated Application at 16.

indirectly controlled by BC Partners Holdings Limited ("BCP"), a U.K.-based investment firm organized under the laws of Guernsey, a British Crown Dependency.²

II. THE PARTIES

A. The Transferor – Intelsat/Existing Control Group

Intelsat is a provider of fixed satellite services ("FSS"). Intelsat owns and operates a global satellite system that provides space segment capacity used for communications services such as voice, video, data, and Internet connectivity. As noted above, Intelsat is the indirect parent of the six Intelsat Licensees: (1) Intelsat LLC, which holds non-common carrier earth station licenses, an experimental license, and private land mobile radio licenses; (2) Intelsat North America LLC, which holds non-common carrier space and earth station licenses; (3) Intelsat General Corporation, formerly called Intelsat Government Solutions Corporation, which holds an international section 214 authorization to provide global or limited global facilities-based and resale service; (4) Intelsat USA License Corp., which holds international section 214 authorizations; (5) PanAmSat Licensee Corp., which holds non-common carrier space and earth station licenses; and (6) PanAmSat H-2 Licensee Corp., which holds one non-common carrier space station license. Intelsat offers service in more than 200 countries, serving customers such as large telecommunications carriers, broadcasters, corporate networks, Internet service providers, distributors that resell capacity, and customers that purchase capacity for their own use.³

The current owners of Intelsat are twenty entities ultimately controlled by the Existing Control Group. Each of the four investment groups comprising the Existing Control Group controls equity and voting interests of approximately twenty-three percent in Intelsat (as measured on a fully diluted basis). Intelsat's management team holds the remaining equity and voting interests.⁴

B. The Transferee – Serafina/BCP

Serafina proposes to acquire all of the equity interests in Intelsat through its wholly-owned subsidiary, Serafina Acquisition Limited, a Bermuda company. The Serafina Board of Directors will be comprised of four members designated by the following investors: (1) BCP (two members); (2) Silver Lake Group, L.L.C. ("Silver Lake"), a U.S.-based investment firm

² Consolidated Application at 1-2. The Existing Control Group of current Intelsat shareholders includes Apax Partners Worldwide LLP and Apax Partners, L.P.; Apollo Management V, L.P.; MDP Global Investors Limited; and Permira Advisers LLC. Consolidated Application at 1.

³ Consolidated Application at 3-5.

⁴ Consolidated Application at 5.

(one member); and (3) Intelsat's management team (one member).⁵ Serafina will issue a single class of voting stock, such that, in all cases, equity and voting interests will be identical.⁶

BCP indirectly will control approximately 71 percent of the equity interests in Serafina. The Consolidated Application states that BCP will control Serafina and, by extension, Intelsat. BCP will exercise its control through 41 subsidiary investment funds (the "BCP Funds"), 35 of which are constituted as U.K. limited partnerships, five of which are constituted as French "coinvest" partnerships, and one of which is constituted as a Guernsey limited partnership. CIE Management II Limited, a wholly-owned subsidiary of BCP organized under the laws of Guernsey, serves as General Partner of each of these investment funds. The economic interests in the 41 investment funds are held by over 200 passive investors.

The Applicants further state that only one passive investor in the BCP Funds will hold a ten percent or greater total indirect equity interest in Serafina. According to Applicants, the Ontario Teachers' Pension Plan Board ("Ontario Teachers") will control an indirect equity interest in Serafina of approximately 11.45 percent. The Applicants state that Ontario Teachers currently does not hold a ten percent or greater interest in any Commission-regulated entity, although an investment group headed by Ontario Teachers has entered into a definitive agreement to acquire a 52 percent equity interest in BCE Nexxia Voice Services Corporation (a subsidiary of BCE Inc.), which has an international section 214 authorization to provide international telecommunications services. The service in the BCE Nexxia Voice Services Corporation (a subsidiary of BCE Inc.), which has an international section 214 authorization to provide international telecommunications services.

BCP itself is owned by eighteen individual shareholders. These shareholders are citizens of: the United States (one); the United Kingdom (four); Germany (three); Italy (four); France (five); and Greece (one). The Applicants state that none of the shareholders holds more than a

⁵ Consolidated Application Attachment 3 at 1. Two members of the Board of Directors will be U.S. citizens and two members will be citizens of Western European WTO Member countries. *Id.* According to Applicants, the boards of directors of Intelsat and Serafina Acquisition Limited will be constituted in the same manner as the Serafina board. *Id.*

⁶ Consolidated Application Attachment 3 at 1.

⁷ Consolidated Application Attachment 3 at 1.

⁸ Consolidated Application at 5 and Attachment 3 at 6.

⁹ According to Applicants, passive investors with their principal place of business in the United States will hold approximately 34.93% of the equity in the BCP Funds, while passive investors with their principal place of business in non-U.S. WTO Member countries will hold approximately 65.07% of the equity in the BCP Funds. Applicants state that no passive investor has its principal place of business in a non-WTO Member country. Consolidated Application at 7 and Attachment 3 at 6.

¹⁰ Applicants state that Ontario Teachers' indirect equity interest in Serafina includes a 10.37% indirect equity interest flowing through the BCP Funds and a 1.08% indirect equity interest flowing through the Silver Lake Funds discussed *infra*. Consolidated Application Attachment 3 at 6.

¹¹ Consolidated Application Attachment 3 at 6-7.

ten percent equity or voting interest in BCP.¹² BCP is governed by a six-member Board of Directors, whose current members are citizens of the United Kingdom (five members) and Italy (one member).¹³

C. Silver Lake

In addition to its ability to appoint one member of the four-member Board of Directors of Serafina, Silver Lake will hold approximately 16.84 percent of the equity interests in Serafina through its control of two funds (the "Silver Lake Funds"). Silver Lake Partners III, L.P. indirectly will hold approximately 16.81 percent and Silver Lake Technology Investors III, L.P. indirectly will hold approximately 0.03 percent of the equity interests in Serafina. Silver Lake also is expected to hold certain veto rights over decisions of Serafina's board.¹⁴

Silver Lake Technology Associates III, L.P. serves as the General Partner of each of the Silver Lake Funds and holds approximately 2.18 percent of the equity interests in the Silver Lake Funds. SLTA III (GP), L.L.C. serves as General Partner of Silver Lake Technology Associates, L.P., and Silver Lake Group, L.L.C. serves as Managing Member of SLTA III (GP), L.C.C. The Managing Members of Silver Lake Group, L.L.C. are three U.S. citizens: James Davidson, Glenn Hutchins, and David Roux.

The economic interests in the Silver Lake Funds are held by over 250 passive limited partners. ¹⁸

¹² Consolidated Application at 7.

¹³ Consolidated Application at 7 and Attachment 3 at 6.

¹⁴ Consolidated Application Attachment 3 at 7. These include veto rights with respect to: (i) certain employment decisions regarding Intelsat's senior management; (ii) Intelsat's annual budget, if certain performance targets are unmet; (iii) capital expenditures substantially in excess of the aggregate amount approved in Intelsat's annual budget; (iv) certain transactions involving aggregate consideration substantially exceeding Intelsat's enterprise value; (v) any incurrence of indebtedness that would raise Intelsat's leverage ratio in violation of financing documents executed at closing; (vi) material changes to accounting policies, audit programs, public accountants, or classification of Serafina for U.S. income tax purposes; (vii) material changes in the nature of Intelsat's business or subsidiaries; (viii) changes to the governing documents of Serafina or Intelsat, or dissolution or liquidation of Serafina or Intelsat; (ix) affiliate transactions involving BCP and its affiliates; (x) any action in violation of applicable foreign corrupt practices prohibitions, Office of Foreign Asset Control rules, or auditor independence requirements. *Id.* at 7 n.9.

¹⁵ Consolidated Application Attachment 3 at 7. Silver Lake Partners, III, L.P., Silver Lake Technology Investors III, L.P., and Silver Lake Technology Associates III, L.P. are Delaware limited partnerships. *Id.* Applicants state that employees of Silver Lake, the majority of whom are U.S. citizens, hold the economic interests in Silver Lake Technology Investors III, L.P. *Id.* at 8.

¹⁶ Consolidated Application Attachment 3 at 7. Both entities are Delaware limited liability companies. *Id.*

¹⁷ *Id*.

¹⁸ Consolidated Application at 7. According to Applicants, limited partners holding approximately 57.40% of the equity in the Silver Lake Funds have their principal place of business in the United States, while limited partners holding approximately 42.60% have their principal place of business outside of the United States. One limited

D. Other Investors

Other investors in Serafina will include Banc of America Capital Investors V, L.P. (3.37 percent); CSFB Strategic Partners III, L.P., which is indirectly controlled by Credit Suisse (1.35 percent); and thirteen members of Intelsat's management team (collectively, at least 2.13 percent). The remaining equity in Serafina, approximately 5.32 percent, is subject to continuing syndication for passive investors by the BCP Funds and, in the event that the full 5.32 percent is not syndicated or acquired by Intelsat management, the remainder will be acquired by the Existing Control Group of Intelsat shareholders.²⁰

III. THE TRANSACTION

On June 19, 2007, Serafina and Serafina Acquisition Limited entered into a Share Purchase Agreement ("Agreement") with Intelsat and funds controlled by the Existing Shareholders. Pursuant to the terms of the Agreement, and upon consummation of the transaction, Serafina and Serafina Acquisition Limited will acquire all of the equity and voting interests in Intelsat from the Existing Shareholders. The aggregate value of the transaction, including the assumption by Serafina of approximately \$11.4 billion of debt, is \$16.4 billion.²¹

In connection with the transaction, Intelsat's subsidiary Intelsat (Bermuda), Ltd. ("Intelsat Bermuda") will create a new wholly-owned direct subsidiary to be named Intelsat Jackson Holdings, Ltd. ("Intelsat Jackson"). Immediately after consummation of Serafina's and Serafina Acquisition Limited's acquisition of all equity and voting interests in Intelsat, Intelsat Bermuda will transfer substantially all of its assets and liabilities to Intelsat Jackson, and the debt issued in connection with the acquisition of Intelsat by Serafina Acquisition Limited will be assigned to Intelsat Bermuda. ²³

partner, holding 0.06% in the Silver Lake Funds, has a principal place of business in Lebanon, a non-WTO Member, and two additional limited partners, with equity interests totaling 1.47% in the Silver Lake Funds, have unknown principal places of business. Consolidated Application at 7-8 and Attachment 3 at 8. Applicants state that no passive limited partner will have the ability to control, manage, or become involved in the day-to-day business operations or decision-making of the Silver Lake Funds, Serafina, or Intelsat. Consolidated Application Attachment 3 at 8.

¹⁹ Consolidated Application Attachment 3 at 1-2. The management team members who will hold Serafina shares are citizens of the United States (9 members), Canada (1 member), France (1 member), Mauritius (1 member), and the United Kingdom (1 member). *Id.* at 2; Consolidated Application at 8. According to the Applicants, Banc of America Capital Investors V, L.P. has its principal place of business in the United States, and CSFB Strategic Partners III, L.P. has its principal place of business in the United States but is controlled by entities with their principal place of business in Switzerland. Consolidated Application at 8.

²⁰ Consolidated Application at 8 and Attachment 3 at 1-2.

²¹ Consolidated Application at 8-9.

²² Intelsat Bermuda, a Bermuda company, is wholly owned by Intelsat. Consolidated Application at 3.

²³ Consolidated Application at 9.

Diagram 1 from the Consolidated Application shows Intelsat's expected ownership structure upon consummation of the transaction.

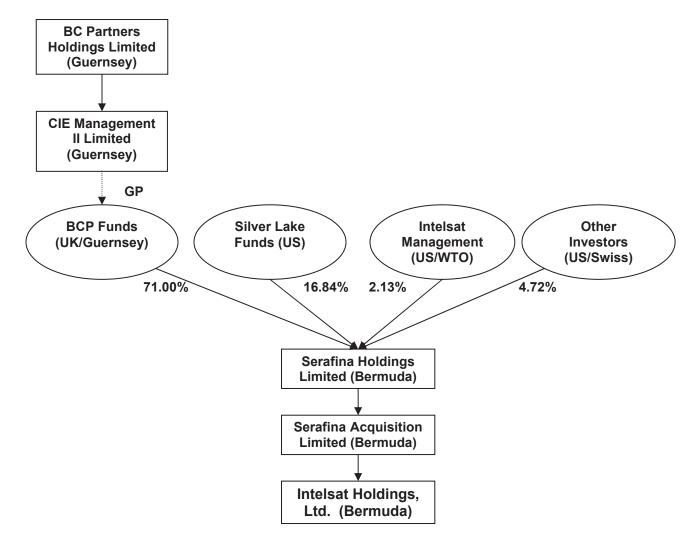


Diagram 1: Intelsat Ownership Following Proposed Transaction²⁴

Note: All subsidiaries are wholly-owned unless otherwise indicated. The stated interest of Intelsat management is based on a minimum equity investment by Intelsat management required by the Agreement and assumes a closing date of January 1, 2008. The minimum equity investment will fluctuate in immaterial amounts depending upon the date of the closing. Individual members of Intelsat's management may elect to reinvest additional amounts in the post-transaction Intelsat. To the extent management increases its equity interest, there may be consequent small adjustments in other investors' interests.

²⁴ Diagram 1 – the organizational chart and note – is excerpted from the Consolidated Application Attachment 3 at 5.

IV. SECTION 310(d) APPLICATIONS

Part 25 – Satellite Earth Station, VSAT, and Space Station Authorizations

The following applications for consent to the transfer of control of satellite earth station, VSAT and space station authorizations have been assigned the file numbers below.

File No.	<u>Licensee</u>	Type of Station Authorization	<u>Call Signs</u>
SAT-T/C-20070810-00113	Intelsat North America LLC	Space stations (28)	KS35, S2647, S2401, S2160, S2395, S2159, S2397, S2469, S2388, S2154, S2400, S2414, S2394, S2411, S2399, S2389, S2392, S2409, S2408, S2407, S2406, S2405, S2404, S2402, S2391, S2396, S2398, S2410
SAT-T/C-20070810-00111	PanAmSat Licensee Corp.	Space stations (23)	S2387, S2385, S2386, S2422, S2715, S2253, S2237, S2378, S2687, S2146, S2377, S2381, S2380, S2229, S2704, S2359, S2461, S2460, S2459, PAS-2R, S2368, S2707, S2382
SAT-T/C-20070810-00112	PanAmSat H-2 Licensee Corp.	Space station (1)	S2423
SES-T/C-20070815-01100	Intelsat North America LLC	Fixed earth stations (26)	E040125, E020169, KB26, KA275, E020314, KA270, E000296, KA269, KA264, KA268, KA263, KA266, E060388, E060384, E000355, KA265, KA267, KA258, KA25, E020315, E980485, E040343, KA261, KA260, KA259, KA262
SES-T/C-20070815-01090	Intelsat LLC	VSAT earth station (1)	E070067
SES-T/C-20070815-01091	Intelsat LLC	Temporary-Fixed earth stations (3)	E920519, E970319, E970091
SES-T/C-20070815-01098	Intelsat LLC	Fixed earth stations (32)	WA22, E980510, E070050, WN52, E060108, E030051, E040286, E030071,

			E060029, E030082, E020191, E030100, E990320, E030101, E990131, E980526, E980200, E040140, E040141, E040414, E960187, KA251, E050048, E050009, E050049, E900992, E010104, E020126, E960186, E030103, E990551, E010206
SES-T/C-20070815-01097	PanAmSat Licensee Corp.	VSAT earth stations (3)	E010280, E050169, E050174
SES-T/C-20070815-01099	PanAmSat Licensee Corp.	Fixed earth stations (71)	E030175, E990091, KA450, E030106, E990056, E940532, E990223, E030096, E980069, E990214, E030073, E900757, E030072, E010019, E990024, E020309, E980503, E020260, E980502, E980501, E980467, E980460, E7465, KA391, E930088, E990363, E881286, E010133, E000063, E990323, E010112, E970391, E040174, E000488, E990092, E990433, E030012, E000363, E050311, E000274, E030306, E000048, E030020, E990441, E990365, E990334, E990224, E030307, E970189, E010113, KA71, E960411, E030232, E000049, E881304, E940333, E860175, E4132, E2178, E950508, E970392, E950502, E970051, E950267, KA416, E950307, E030182, KL91, E950067
SES-T/C-20070815-01093	PanAmSat Licensee Corp.	Temporary-fixed earth stations (2)	E010118, E990055

Part 90 – Wireless Radio Services Authorizations

The following application for consent to the transfer of control of wireless radio services licenses has been assigned the file number listed below.

File No.	<u>Licensee</u>	Type of Station Authorization	Call Signs
0003125329	Intelsat LLC	Industrial/business pool, conventional (4)	WII902, WPAG761, WPRR963, WPYJ473

Part 5 – Experimental Authorization

The following application for consent to transfer of control of an experimental authorization has been assigned the file number listed below.

File No.	Licensee	Call Sign
0026-EX-TC-2007	Intelsat LLC	WD2XHU

V. SECTION 214 APPLICATIONS

Part 63 – International Section 214 Authorizations

The following applications for consent to transfer of control of international section 214 authorizations have been assigned the file numbers listed below.

File No.	Authorization Holder	Authorization Numbers
ITC-T/C-20070815-00336	Intelsat General Corp.	ITC-214-20040528-00213, ITC-MOD-20050329-00170
ITC-T/C-20070815-00331	Intelsat USA License Corp.	ITC-214-19930829-00248, ITC-214-19920318-00117, ITC-MOD-20051007-00445, ITC-214-20051031-00443

VI. EX PARTE STATUS OF THIS PROCEEDING

Pursuant to section 1.1200(a) of the Commission's rules,²⁵ the Commission may adopt modified or more stringent *ex parte* procedures in particular proceedings if the public interest so requires. We announce that this proceeding will be governed by permit-but-disclose *ex parte* procedures that are applicable to non-restricted proceedings under section 1.1206 of the Commission's rules.²⁶

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²⁵ 47 C.F.R. § 1.1200(a).

²⁶ *Id.* § 1.1206.

We direct parties making oral *ex parte* presentations to the Commission's statement reemphasizing the public's responsibility in permit-but-disclose proceedings and remind such parties that memoranda summarizing the presentation must contain the presentation's substance and not merely list the subjects discussed.²⁷ More than a one- or two-sentence description of the views and arguments presented is generally required.²⁸ Other rules pertaining to oral and written presentations are set forth in section 1.1206(b) as well.²⁹ We urge parties to use the Electronic Comment Filing System ("ECFS") to file *ex parte* submissions.³⁰

VII. GENERAL INFORMATION

The applications referenced herein have been found, upon initial review, to be acceptable for filing. The Commission reserves the right to return any application if, upon further examination, it determines the application is defective and not in conformance with the Commission's rules or policies. Final action on these applications will not occur earlier than thirty-one (31) days following the date of this Public Notice.³¹

Interested parties may file petitions to deny or comments no later than **October 19, 2007.** Responses or oppositions to comments and petitions may be filed no later than **November 5, 2007**. Replies to such pleadings may be filed no later than **November 13, 2007**. All filings concerning matters referenced in this Public Notice should refer to **DA 07-3972** and **IB Docket No. 07-181**, as well as to the specific file numbers of the individual applications or other matters to which the filings pertain.

Under the Commission's procedures for the submission of filings and other documents,³² submissions in this matter may be filed electronically (i.e., though ECFS) or by hand delivery to the Commission's Massachusetts Avenue location.

• **Electronic Filers**: 33 Comments may be filed electronically using the Internet by accessing the ECFS: http://www.fcc.gov/cgb/ecfs/. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number. Parties also may submit an electronic comment by Internet e-

²⁷ See Commission Emphasizes the Public's Responsibilities in Permit-But-Disclose Proceedings, Public Notice, 15 FCC Rcd 19945 (2000).

²⁸ See 47 C.F.R. § 1.1206(b) (2).

²⁹ *Id.* § 1.1206(b).

³⁰ See discussion infra Part VII.

³¹ See 47 U.S.C. § 309(b).

³² See Implementation of Interim Electronic Filing Procedures for Certain Commission Filings, Order, 16 FCC Rcd 21483 (2001); see also FCC Announces a New Filing Location for Paper Documents and a New Fax Number for General Correspondence, Public Notice, 16 FCC Rcd 22165 (2001); Reminder: Filing Locations for Paper Documents and Instructions for Mailing Electronic Media, Public Notice, 18 FCC Rcd 16705 (2003).

³³ See Electronic Filing of Documents in Rulemaking Proceedings, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov, and include the following words in the body of the message, "get form." A sample form and directions will be sent in response.

• **Paper Filers**: Parties who choose to file by paper must file an original and four copies of each filing.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, N.E., Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of <u>before</u> entering the building.

Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, S.W., Washington, D.C. 20554.

One copy of each pleading must be delivered electronically, by e-mail or facsimile, or if delivered as paper copy, by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (according to the procedures set forth above for paper filings), to the Commission's duplicating contractor, Best Copy and Printing, Inc., at fcc@bcpiweb.com or (202) 488-5563 (facsimile).

Additionally, filers may deliver courtesy copies by e-mail or facsimile to the following Commission staff:

- (1) James Ball, Policy Division, International Bureau, at James.Ball@fcc.gov or (202) 418-2824 (facsimile);
- (2) Kathleen Collins, Policy Division, International Bureau, at Kathleen.Collins@fcc.gov or (202) 418-2824 (facsimile);
- (3) Karl Kensinger, Satellite Division, International Bureau, at Karl.Kensinger@fcc.gov or (202) 418-0748 (facsimile);
- (4) Jeffrey Tobias, Wireless Telecommunications Bureau, at Jeff.Tobias@fcc.gov or (202) 418-2643 (facsimile);
- (5) John Kennedy, Office of Engineering and Technology, at John.Kennedy@fcc.gov or (202) 418-1918 (facsimile); and
- (6) Neil Dellar, Office of General Counsel, at Neil.Dellar@fcc.gov or (202) 418-1234 (facsimile).

Copies of the applications and any subsequently-filed documents in this matter may be obtained from Best Copy and Printing, Inc., in person at 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, via telephone at (202) 488-5300, via facsimile at (202) 488-5563, or via e-mail at fcc@bcpiweb.com. The applications and any associated documents are also available for public inspection and copying during normal reference room hours at the following Commission office: FCC Reference Information Center, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. The applications also are available electronically through the Commission's ECFS, which may be accessed on the Commission's Internet website at http://www.fcc.gov.

People with Disabilities: To request this Public Notice in accessible formats (computer diskette, large print, audio recording, and Braille) send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

For further information, contact Kathleen Collins, Policy Division, International Bureau, at 202-418-1460.

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