

**APPLICATION FOR TRANSFER OF CONTROL OF THE  
INTELSAT 702 SATELLITE (CALL SIGN S2388)  
FROM U.S TO GERMAN LICENSING AUTHORITY**

**I. Description of the Proposed Transfer of Control – Response to Questions 43 and A.20**

Intelsat License LLC (f/k/a Intelsat North America LLC) (“Intelsat”) herein requests authority to transfer the Intelsat 702 satellite (S2388) from United States licensing authority to German licensing authority upon arrival of the satellite at the 47.5° E.L. orbital location.<sup>1</sup> The German Administration will be the International Telecommunication Union (“ITU”) notifying administration responsible for ensuring that the satellite’s operations at the 47.5° E.L. orbital location comply with all relevant coordination agreements for the location. Germany already is responsible for satellite licensing and oversight of Intelsat satellites at this nominal orbital location. Intelsat has a pending request for FCC authorization to drift Intelsat 702 to, and operate temporarily at, 54.85° E.L.<sup>2</sup> Intelsat expects to operate the satellite at 54.85° E.L. until

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<sup>1</sup> Europe\*Star Gesellschaft Fur Satellitenkommunikation mbH (“Europe\*Star”) holds a German authorization to operate all the frequencies on Intelsat 702 at 47.5° E.L. under the satellite network EUROPE\*STAR-47.5E filed with the ITU by the German administration. Europe\*Star will communicate to the Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (“BNetzA”) that Intelsat 702 will be operated under the existing authorization. PanAmSat Europe Corporation (“PanAmSat Europe”), a Delaware company that is wholly owned by Intelsat Corporation (f/k/a/ PanAmSat Corporation), owns 51 percent of Europe\*Star. Certain members of the Shulte-Hillen family and other entities own the remaining 49 percent of Europe\*Star. The German representative of the Schulte-Hillen family is Beatrix von Wietersheim. The officer and director of Europe\*Star is Patricia Casey, Manager. The officers and directors of PanAmSat Europe are:

Stephen Spengler – Chairman of the Board, President and COO; Director  
Patricia Casey – SVP, GC & Secretary; Director  
Linda Bartlett – SVP & Controller; Director  
Hank Courson – VP & Treasurer

Intelsat previously filed with the FCC, under a request for confidential treatment, the New Slot Usage Agreement between Europe\*Star and PanAmSat Europe, and incorporates that agreement herein by reference. *See Intelsat North Am. LLC, Request for Confidential Treatment and Submission of Confidential Information Re: New Slot Usage Agreement Between Europe\*Star and PanAmSat*, File No. SAT-STA-200611102-00128 (Jan. 22, 2007) (Confidential Filing Not Made Publicly Available); *see also Intelsat North Am. LLC, Response to FCC Jan. 5, 2007 Request for Additional Information Re: Intelsat 601 Move From 63.65° E.L. to 47.5° E.L.*, File No. SAT-STA-20061102-00128 (Jan. 22, 2007).

<sup>2</sup> *See Intelsat License LLC Request for Special Temporary Authority to Drift and Operate Intelsat 702*, File No. SAT-STA-20110307-00051 (filed Mar. 7, 2011).

approximately mid-August 2011, after which it will be redeployed to 47.5° E.L.<sup>3</sup> By this application, Intelsat is not requesting authority to assign or transfer control of any authorization granted by the Commission. Intelsat does not plan to be a Commission licensee with respect to the Intelsat 702 satellite once this satellite has arrived at 47.5° E.L., as the satellite will be operated pursuant to Germany's ITU filings for that location. Furthermore, Intelsat is not transferring ownership of the satellite.

## **II. Public Interest Statement – Response to Question A.21**

The purpose of this application is to facilitate the re-licensing of Intelsat 702 as a German authorized satellite once it is located at the 47.5° E.L. orbital location. Grant of this application will serve the public interest by allowing Intelsat to re-locate Intelsat 702 in order to ensure continuity of service at the 47.5° E.L. orbital location given the planned de-orbit of Intelsat 601 later this year. The FCC approved the re-licensing of Intelsat 601 as a German-authorized satellite in 2007 and the re-licensing of Galaxy 27 as a German-authorized satellite in 2010.<sup>4</sup> Re-licensing allows Intelsat to operate the Intelsat 702 satellite with the coordination benefits associated with Germany's ITU filings for the 47.5° E.L. location. No customers currently operating on Intelsat 702 will be negatively affected, as they will have been relocated to other satellites prior to Intelsat 702's drift to 47.5° E.L.<sup>5</sup> Intelsat expects Intelsat 702 to remain at 47.5° E.L. until it is de-orbited. Intelsat will comply with any post-mission disposal requirements imposed by the German Administration.

As noted in Intelsat's pending request for drift authority, Intelsat anticipates that the FCC will exchange letters with Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen ("BNetzA") in Germany to ensure there is a mutual understanding regarding the operation of Intelsat 702 at 47.5° E.L. Upon completion of the maneuvers required to place Intelsat 702 at 47.5° E.L., Intelsat will notify the Commission and surrender its license for the Intelsat 702 satellite.

## **III. Foreign Ownership – Response to Question 34**

The Commission previously approved the foreign ownership in Intelsat License LLC ("Intelsat"). See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated*

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<sup>3</sup> Intelsat will file shortly an STA request for the drift from 54.85° E.L. to 47.5° E.L. There is a possibility that, subject to receipt of FCC approval, Intelsat 702 will operate temporarily at a location in between 54.85° E.L. and 47.5° E.L. before continuing to 47.5° E.L.

<sup>4</sup> *Intelsat North America LLC, Application for Special Temporary Authority Concerning the Relocation of Intelsat 601 to the 47.5° W.L. Orbital Location*, Order, 22 FCC Rcd 19258 (Int'l Bur. Oct. 31, 2007); See *Policy Branch Information; Actions Taken*, Report No. SAT-00713, DA No. 10-1456, File No. SAT-T/C-20100112-00009 (Aug. 6, 2010) (Public Notice).

<sup>5</sup> The Intelsat 702 satellite is being replaced by the Intelsat 17 satellite, which commenced operations at 66.0° E.L. on January 5, 2011. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, File No. SAT-LOA-20100726-00167 (filed Jan. 5, 2011).

*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”).* In December 2009, the Commission also approved certain *pro forma* changes in Intelsat’s foreign ownership. There have been no other material changes to the foreign ownership since the date of the *Intelsat-Serafina Order*.

#### **IV. Previously Revoked Authorization – Response to Question 36**

Intelsat License LLC (“Intelsat”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat Licensee Corp. (“PanAmSat”), a former sister company of Intelsat, based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones. *See* PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000). 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 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 either PanAmSat’s or Intelsat’s basic qualifications, which are well-established and a matter of public record.

#### **V. Officers, Directors and Ten Percent Shareholders – Response to Questions 40 and A.20**

Following are the officers of Intelsat License LLC:

Michael McDonnell, Chairman  
Flavien Bachabi, Deputy Chairman  
Phillip Spector, Secretary  
Simon Van De Weg, Director, Finance

Following are the members of the Board of Managers of Intelsat License LLC:

Michael McDonnell  
Flavien Bachabi  
Phillip Spector

The address of all Intelsat License LLC officers and members of the Board of Managers is:

4 rue Albert Borschette  
L-1246 Luxembourg

Intelsat License LLC is a Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License 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 Phoenix Holdings S.A., a Luxembourg company. Intelsat Phoenix Holdings 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”). Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *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*”).