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September 21, 2011

Jennifer D. Hindin
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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**Re: Intelsat License LLC and Intelsat New Dawn Company, Ltd.,
Application for *Pro Forma* Transfer of Control; File Nos. SAT-T/C-
20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948,
SES-T/C-20110812-00963, and 0004825139**

Dear Ms. Dortch:

Intelsat License LLC and Intelsat New Dawn Company, Ltd. (collectively, the “Intelsat Licensees”), by counsel, herein provide information to supplement the above-referenced applications seeking Commission consent to the *pro forma* transfer of control of all of the licenses held by the Intelsat Licensees (“Intelsat Licenses”).

First, attached as Exhibit A to this letter is the form of voting proxy that will be granted by SLP III Investment Holding S.à r.l. to Serafina S.A. This voting proxy will be signed and become effective upon consummation of the *pro forma* transactions described in the above-referenced applications.

Second, attached as Exhibit B to this letter are more comprehensive ownership charts to supplement the ownership charts provided with the initial application. These expanded charts include the previously omitted subsidiaries that are not affected by the proposed *pro forma* transaction and provide the place of incorporation of each entity.

Third, this letter reaffirms that the commitments and undertakings in the October 9, 2007 Letter to the Executive Branch Agencies attached as Attachment C to the *Intelsat-Serafina Order*¹ will continue to be binding after the proposed *pro forma* transfer of control.

¹ *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, Attachment C (2007) (“*Intelsat-Serafina Order*”).



Fourth, the Intelsat Licensees confirm that BC Partners Holdings Limited and Silver Lake Group, L.L.C. do not hold an attributable interest in any telecommunications, satellite, or media company serving any U.S. market that Intelsat also serves.²

Finally, the Intelsat Licensees clarify that the response to Question 99b on FCC Form 603 should be “no.” The Intelsat Licensees hold no common carrier radio licenses and are consequently exempt from Section 310(b)(4) of the Communications Act.

Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin

Counsel to Intelsat License LLC and Intelsat New Dawn Company, Ltd.

cc: Gardner Foster
Karl Kensinger
Kathleen Collins

² *Intelsat-Serafina Order* at ¶ 22.

EXHIBIT A

SLP III Investment Holding S.à r.l.

Société à responsabilité limitée

63, rue de Rollingergrund, L-2440 Luxembourg

[EUR 12,500]¹

R.C.S. Luxembourg B162420

Intelsat Global Holdings S.A. Shareholder's Proxy and Power of Attorney

For good and valuable consideration, the receipt of which is hereby acknowledged, by this irrevocable proxy, the undersigned, SLP III Investment Holding S.à r.l. (RCS Luxembourg B162420), as a current holder of Class A common shares, nominal value \$0.01 per share (the "Class A Shares"), of Intelsat Global Holdings S.A. (RCS Luxembourg B162135) (the "Company") and from time to time a holder of other Voting Shares (as defined below), **HEREBY APPOINT(S)** [Serafina S.A.] (RCS Luxembourg B[]) ("BC Partners") to be the agent, standing proxy and attorney of the undersigned and delegates power and authority, to represent, and act on behalf of, the undersigned in respect of the Specified Shares and to vote the Specified Shares on behalf of the undersigned at any meeting, ordinary or extraordinary, general or special, of the Company and at any adjournment thereof and, on behalf of the undersigned, to consent to short notice of any such meeting, and, on behalf of the undersigned to agree, approve and/or execute any written consent or resolutions with respect to the Specified Shares in lieu of any general meeting of the Company on any date following the date hereof.

For purposes of this proxy:

(i) "Voting Shares" means (i) the Class A Shares, (ii) Class B common shares, nominal value \$0.01 per share of the Company and (iii) any class of voting shares or other securities of the Company into which any Voting Shares are reclassified, exchanged or converted or which are distributed in respect of, or issued in a reorganization, share capital re-composition or other transaction in exchange or in replacement for, any such Voting Shares; and

(ii) "Specified Shares" means, as of any date, the minimum amount of Voting Shares owned by the undersigned which, when combined with the Voting Shares then beneficially owned (as defined in Rule 13d-3 promulgated under the United States Securities Exchange Act of 1934) by BC Partners, will permit BC Partners to vote a majority of the outstanding Voting Shares at any general or special meeting of the Company (it being understood that the minimum amount may be zero if BC Partners beneficially owns a majority of such outstanding Voting Shares).

¹ Note to draft: To state the issued share capital at the time of signing.

Other than with respect to voting of the Specified Shares, this proxy shall not alter SLP III Investment Holding S.à r.l.'s rights as a shareholder of the Company, including the right of alienation and any rights under Luxembourg law or any existing shareholders agreements.

This proxy may not be assigned or otherwise transferred by BC Partners other than to affiliates of BC Partners which constitute "permitted transferees" under (and subject to the terms of) any applicable shareholders agreements.

This proxy shall be governed by and construed in accordance with the laws of the State of New York applicable to contracts made and to be performed entirely within such State.

Dated this [__] day of [_____], 2011

SLP III Investment Holding S.à r.l.

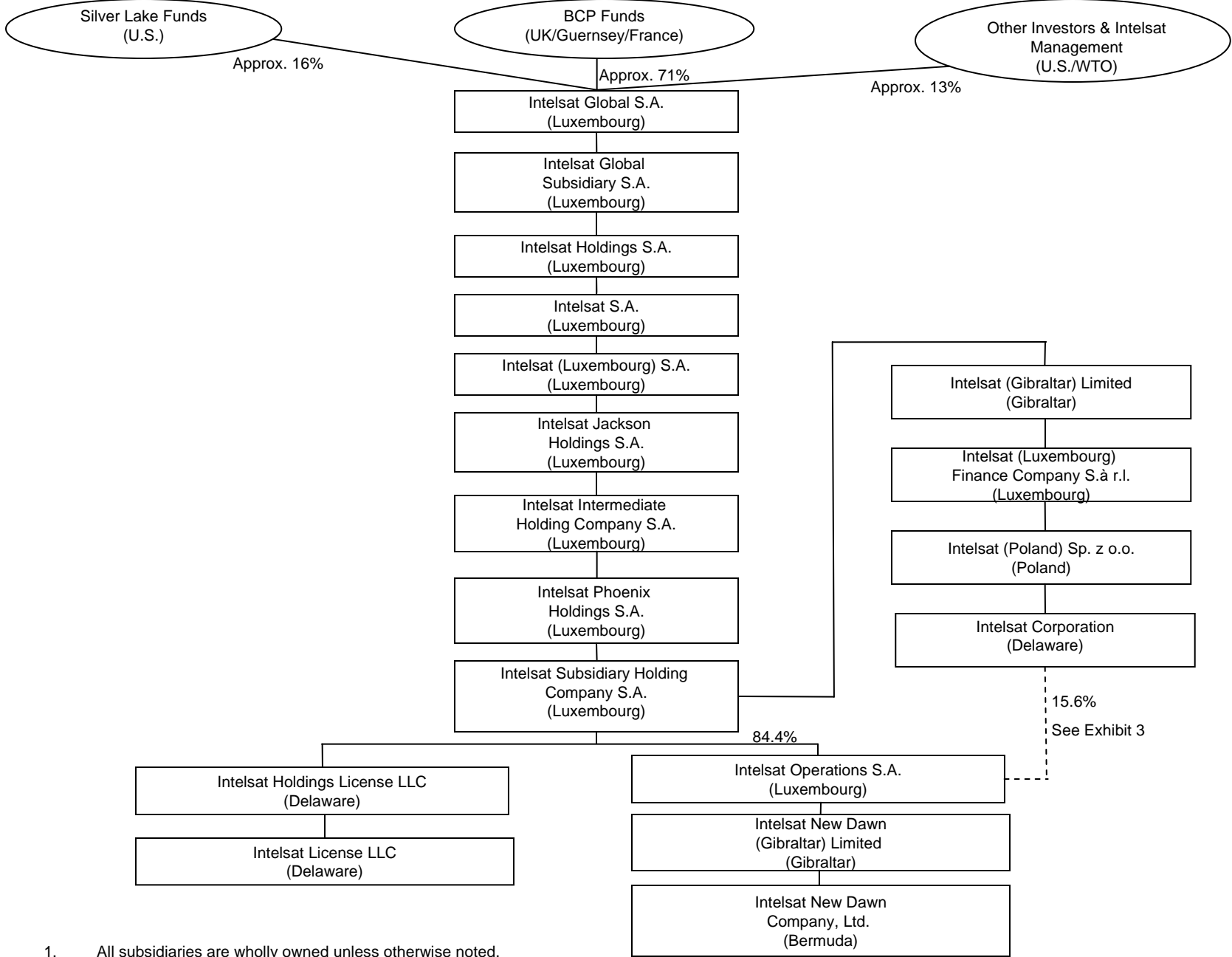
Address:

Signed by the above named Shareholder in the presence of:

Witness Signature:	
Witness Name (Print):	
Witness Address (Print):	

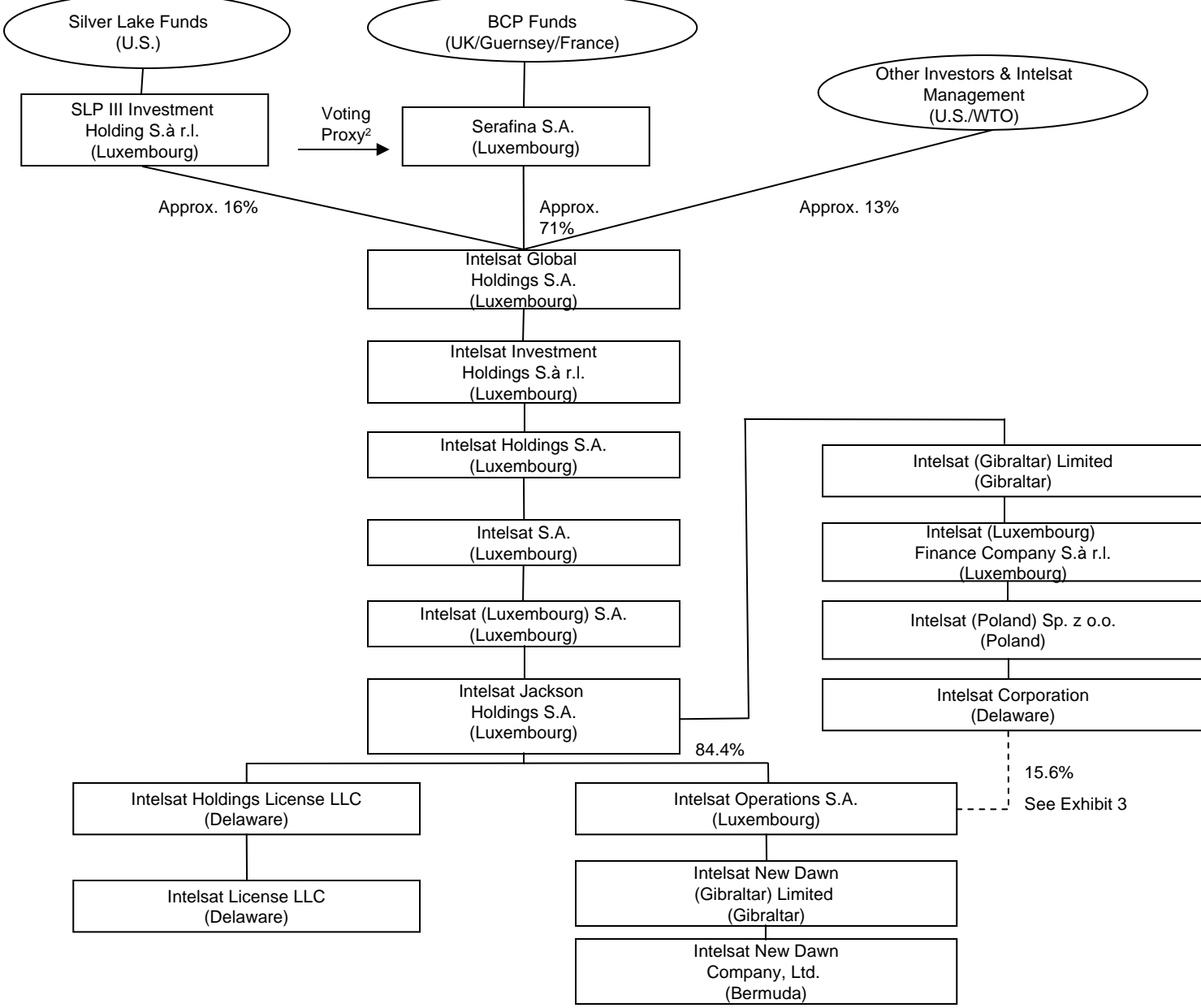
EXHIBIT B

**Exhibit 1:
Intelsat Licensees Current Ownership¹**



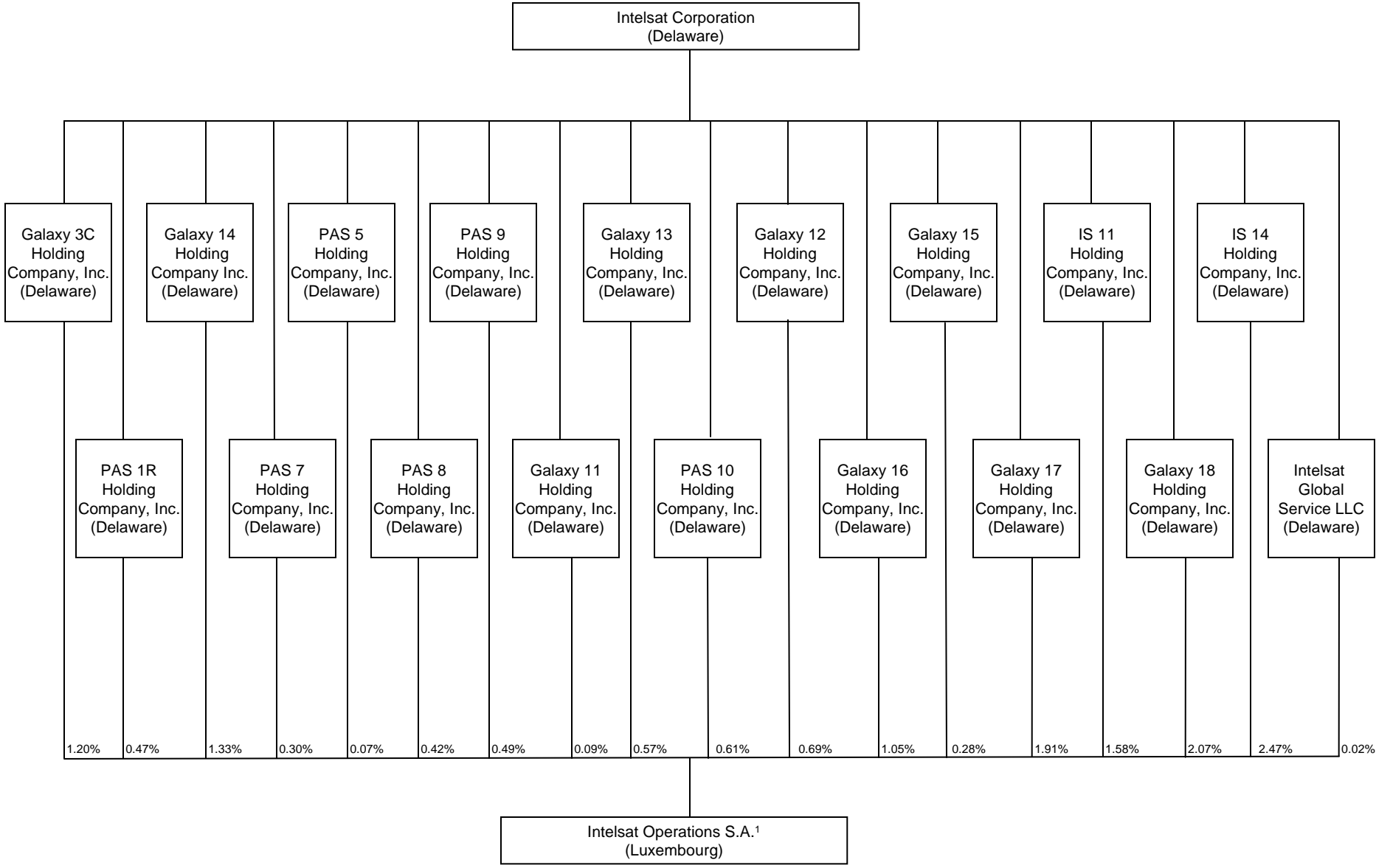
1. All subsidiaries are wholly owned unless otherwise noted.

Exhibit 2:
Intelsat Licensees Ownership Following Pro Forma Transfer¹



1. All subsidiaries are wholly owned unless otherwise noted.
 2. The proxy ensures that Serafina S.A. votes an absolute majority of the shares of Intelsat Global Holdings S.A.

Exhibit 3:
Holding Companies Owning Preferred Equity
Certificates of Intelsat Operations S.A.



1. The percentages identified in this chart represent economic interest in Intelsat Operations S.A. These entities hold no voting interests or common shares in Intelsat Operations S.A.