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March 16, 2012

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

**Re: Intelsat License LLC and Intelsat New Dawn Company, Ltd.
Request for Extension of Closing Deadline; 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, respectfully request an additional 120 days—until August 8, 2012—to consummate the *pro forma* transfer of control that the Commission previously approved in the above-referenced proceedings.

On August 11, 2011, the Intelsat Licensees sought authority for the *pro forma* transfer of control of all of the earth station, space station, and wireless licenses and authorizations held by the Intelsat Licensees. Specifically, the Intelsat Licensees proposed two non-substantial changes to the ownership of the Intelsat Licensees as a part of a corporate reorganization: (1) the creation of new holding companies and (2) the removal of certain holding companies.

On October 13, 2011, the International Bureau authorized the *pro forma* transfer of control of the earth station and space station licenses held by the Intelsat Licensees.¹ The Commission has extended the deadline for consummating the *pro forma* transfer of the earth and space station licenses until April 10, 2012.²

On October 19, 2011, the Wireless Telecommunications Bureau authorized the *pro forma* transfer of control of the wireless authorizations held by the Intelsat

¹ See *Policy Branch Information; Actions Taken*, Report No. SAT-00815, DA 11-1713, File Nos. SAT-T/C-20110810-00160 and SAT-T/C-20110811-00161 (rel. Oct. 14, 2011; effective Oct. 13, 2011); *Satellite Communications Services Information; Actions Taken*, Report No. SES-01390, File Nos. SES-T/C-20110811-00948 and SES-T/C-20110812-00963 (rel. Oct. 19, 2011; effective Oct. 13, 2011).

² See *Letter from Jennifer Hindin to Marlene H. Dortch*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, and SES-T/C-20110812-00963 (stamp grant Dec. 13, 2011).

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Licensees.³ Pursuant to Section 1.948(d), 47 C.F.R. § 1.948(d), the deadline for consummating the *pro forma* transfer of control of the wireless license is 180 days after authorization—April 16, 2012.⁴

However, the corporate reorganization is still pending and additional time is needed to conclude the business steps that are necessary prerequisites to the reorganization. Grant of the requested extension will serve the public interest by permitting Intelsat an opportunity to complete the already approved restructuring in a time frame consistent with current business considerations.

Accordingly, the Intelsat Licensees respectfully request a 120-day extension of the closing deadline. Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin

cc: Karl Kensinger
Jeanette Spriggs
Jeff Tobias

³ See *Wireless Telecommunications Bureau, Assignment of License Authorization Applications, Transfer of Control of Licensee Applications, De Facto Transfer Lease Applications and Spectrum Manager Lease Notifications, Designated Entity Reportable Eligibility Event Applications, and Designated Entity Annual Reports Action*, Report No. 7258, File No. 0004825139 (rel. Oct. 26, 2011; effective Oct. 19, 2011).

⁴ Intelsat understands that the requested extension until August 8, 2012 is not technically 120 days after the April 16, 2012 deadline for consummation of the *pro forma* transfer of the wireless authorizations, Intelsat, however, seeks to conform the consummation deadline for the wireless authorizations to the consummation deadline for the earth and space station licenses.