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June 26, 2008

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: IBFS File No. SES-T/C - 20080610-00745

Dear Ms. Dortch:

In response to a request by FCC staff, the parties to the above-referenced application (Hewlett-Packard Company, transferee, and Electronic Data Systems Corporation, transferor) hereby supplement their application with revised Exhibits E and F.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Timothy J. Cooney
Timothy J. Cooney

**Enclosures** 

# EXHIBIT E (Ownership Exhibit Supplemented June 26, 2008)

EDS Spectrum Corporation, a wholly-owned subsidiary of Electronic Data Systems Corporation (EDS) holds several private, non-common carrier earth station licenses. On May 13, 2008, Hewlett-Packard Company (HP) and EDS (collectively, the "Parties") announced a definitive agreement under which HP will purchase EDS. As a leading global provider of products, technologies, software, solutions and services, HP is among the world's largest technology companies. EDS is a leading global technology service company delivering business solutions to its clients. The combination of HP and EDS will create a leading force in global IT services. The Parties request Commission approval of the transfer of control of EDS and EDS Spectrum Corporation to HP. Pretransaction and post-transaction organizational charts are attached.

The headquarters of Hewlett-Packard Company is located at 3000 Hanover Street, Palo Alto, California 94304. HP is publicly traded on the New York Stock Exchange. To the Parties' knowledge, there are no entities that own 10 percent or more of HP's stock. A list of HP's executive officers and directors is attached.

#### **Additional Authorizations**

While the list of call signs referenced in this application is intended to be complete and to include all of the licenses and authorizations subject to this transaction, EDS and EDS Spectrum Corporation may hereafter file additional requests for authorizations for new or modified facilities that may be granted before the Commission takes action on the instant application. Accordingly, the Parties request that any Commission approval of the instant application include authority for HP to acquire control of any authorization issued to EDS and EDS Spectrum Corporation during the pendency of the transaction and the period required for consummation of the transaction. Such action would be consistent with prior decisions of the Commission.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> Because none of the FCC licenses held by EDS and EDS Spectrum Corporation are broadcast, common carrier, or aeronautical, the foreign ownership restrictions under Section 310(b) of the Communications Act of 1934, as amended (47 U.S.C. 310(b)), do not apply.

<sup>&</sup>lt;sup>2</sup> Applications of NYNEX Corp., Transferor, and Bell Atlantic Corp., Transferee, for Consent to Transfer Control of NYNEX Corp. and Its Subsidiaries, Memorandum Opinion and Order, 12 FCC Rcd 19985, 20097 (1997); Applications of Craig O. McCaw, Transferor, and AT&T, Transferee, for Consent to the Transfer of Control of McCaw Cellular Communications, Inc. and its Subsidiaries, Memorandum Opinion and Order, 9 FCC Rcd 5836, 5909 n.300 (1994).

### HEWLETT-PACKARD COMPANY

# ELECTRONIC DATA SYSTEMS CORPORATION and E.D.S. SPECTRUM CORPORATION

### PRE-TRANSACTION OWNERSHIP STRUCTURE

## HEWLETT-PACKARD COMPANY

(a Delaware corporation)

No owners of ten percent or more

# ELECTRONIC DATA SYSTEMS CORPORATION

(a Delaware corporation)

100% owned

## E.D.S. SPECTRUM CORPORATION

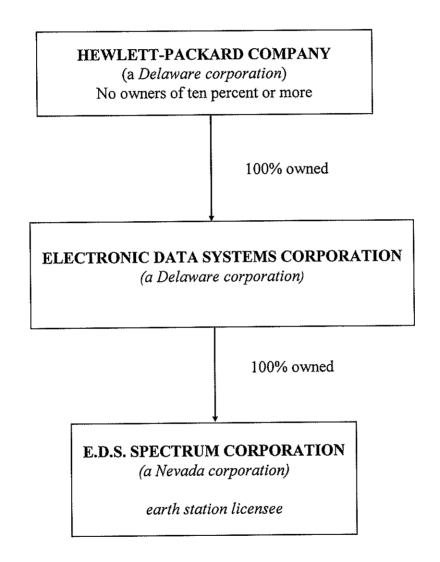
(a Nevada corporation)

earth station licensee

### HEWLETT-PACKARD COMPANY

# ELECTRONIC DATA SYSTEMS CORPORATION and E.D.S. SPECTRUM CORPORATION

POST-TRANSACTION OWNERSHIP STRUCTURE\*



<sup>\*</sup> Post-merger structure, immediately following the acquisition of Electronic Data Systems Corporation by Hewlett-Packard Company.

### **Hewlett-Packard Company**

Name **Position** Mark V. Hurd Chairman, CEO & President G. Kennedy Thompson Director Joel Z. Hyatt Director John H. Hammergren Director John R. Joyce Director Lawrence T. Babbio, Jr. Director Lucille S. Salhany Director Richard A. Hackborn Director Robert L. Ryan Director Sari M. Baldauf Director Jon E. Flaxman Executive Vice President and Chief Administrative Officer Executive Vice President, General Counsel and Secretary Michael J. Holston Catherine A. Lesjak Executive VP, CFO Randy (Randall) D. Mott Executive VP, Chief Information Officer Shane V. Robison Executive VP, Chief Strategy & Technology Officer Marcela Perez De Alonso Executive VP, Human Resources Vyomesh I. Joshi Executive VP, Imaging and Printing Group R. Todd Bradley Executive VP, Personal Systems Group Ann M. Livermore Executive VP, Technology Solutions Group John N. McMullen Sr. VP and Treasurer James T. Murrin Sr. VP, Controller

Address: 3000 Hanover Street, Palo Alto, California 94304

Hewlett-Packard Company has no stockholders with ten percent or more of the outstanding stock.

# EXHIBIT F (Public Interest Exhibit Supplemented June 26, 2008)

As described in Exhibit E, EDS Spectrum Corporation, a wholly-owned subsidiary of Electronic Data Systems Corporation (EDS), holds several private, non-common carrier earth station licenses. On May 13, 2008, Hewlett-Packard Company (HP) and EDS (collectively, the "Parties") announced a definitive agreement under which HP will purchase EDS. As a leading global provider of products, technologies, software, solutions and services, HP is among the world's largest technology companies. EDS is a leading global technology service company delivering business solutions to its clients. The combination of HP and EDS will create a leading force in global IT services. The public interest will be served by allowing licensee EDS Spectrum Corporation to continue to use the earth station licenses to support the needs of EDS customers without interruption.