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January 24, 2013

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

Intelsat License LLC and Intelsat New Dawn Company, Ltd. Request for Extension of Closing Deadline, IB Docket No. 11-205; File Nos. SAT-T/C-20111123-00225, SAT-T/C-20111123-00226, SES-T/C-20111123-01403, and SES-T/C-20111206-01427.

Dear Ms. Dortch:

Re:

Intelsat License LLC and Intelsat New Dawn Company, Ltd. (collectively, the "Intelsat Licensees"), by counsel, respectfully request an additional 180 days—until August 11, 2013—to consummate the transfer of control that the Commission previously approved in the above-referenced proceedings.

On November 23, 2011, the Intelsat Licensees sought authority for the transfer of control of all of the earth station, space station, and wireless licenses and authorizations held by the Intelsat Licensees.<sup>2</sup> Specifically, the Intelsat Licensees proposed to transfer control pursuant to a public offering of newly issued voting shares, subsequent voting share sales by current shareholders, and possible private placements of newly issued voting shares.<sup>3</sup>

On May 16, 2012, the International Bureau authorized the transfer of control of the earth station and space station licenses held by the Intelsat Licensees.<sup>4</sup> On July 31,

On January 17, 2013, the FCC approved a *pro forma* assignment of the Intelsat 28 (f/k/a Intelsat New Dawn) space station authorization from Intelsat New Dawn Company, Ltd. to Intelsat License LLC as part of a corporate reorganization. *In the Matter of Intelsat License LLC's Application for the Pro Forma Assignment of Intelsat New Dawn Company, Ltd.'s Space Station Authorization*, File No. SAT-ASG-20130116-00009 (granted Jan. 17, 2013). The Intelsat Licensees expect to consummate this *pro forma* transaction in early March 2013. Upon consummation, Intelsat License LLC will hold all of the space station authorizations included in this request for extension of time.

<sup>&</sup>lt;sup>2</sup> Intelsat Application for Transfer of Control, IB Docket No. 11-205, File Nos. SAT-T/C-20111123-00225, SAT-T/C-20111123-00226, SES-T/C-20111123-01403, SES-T/C-20111206-01427 and 0004961083 (filed Nov. 23, 2011) ("Intelsat Transfer Application").

See Intelsat Global Holdings, S.A. Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership, IB Docket NO. 11-205, Order, 27 FCC Rcd 5226 (rel. May 16, 2012) ("Intelsat Transfer Application Grant"). On May 16,



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2012, the Commission extended the deadline for consummating the transfer of the earth and space station licenses by 180 days—until February 12, 2013.<sup>5</sup>

Grant of this request for an extension of time will serve the public interest. The timing for consummation of the approved of the transfer of control is influenced by several variables. As the Intelsat Licensees indicated in the *Intelsat Transfer Application*, "[t]he timing and volume of the Transactions depend upon prospects reflecting industry and company factors and general market conditions." Grant of the requested extension will serve the public interest by permitting Intelsat an opportunity to complete the approved transfer of control in a time frame consistent with current business and market considerations.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin

(Continued . . .)

Intelsat Transfer Application at 4.

<sup>2012,</sup> the Wireless Telecommunications Bureau authorized the transfer of control of the wireless authorizations held by Intelsat License LLC. 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. 7780, File No. 0004961083 (rel. May 23, 2012; effective May 16, 2012).

Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission (filed Jul. 30, 2012; stamp grant Jul. 31, 2012). The Commission has also extended the deadline for consummating the transfer of the wireless authorizations held by Intelsat License LLC until May 17, 2013. *See* Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, Federal Communications Commission, File No. 0005476056 (granted Nov. 6, 2012).