

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Infosat Able Holdings, Inc.,)	File No. ITC- T/C-20201215-00208;
Telesat Canada,)	SAT-T/C-20201215-00145;
Skynet Satellite Corp.,)	SES-T/C-20201215-01389;
Telesat Network Services, Inc., and)	SES-T/C-20201215-01390;
Telesat Corporation)	SES-T/C-20201215-01391;
)	SES-T/C-20201216-01411;
Application for Consent to Transfer)	SES-T/C-20201216-01412;
Control of International Authorizations)	SES-T/C-20201216-01413
Pursuant to Section 214 of the)	
Communications Act, As Amended,)	
The Implementing Regulation at)	
47 C.F.R. § 63.18(e)(1), and)	
Consent to Transfer Control of Satellite)	
Space and Earth Station Authorizations)	
Pursuant to 47 C.F.R. § 25.137.)	

PETITION TO ADOPT CONDITIONS TO AUTHORIZATIONS AND LICENSES

Pursuant to Executive Order 13913, the National Telecommunications and Information Administration (NTIA) submits this Petition to Adopt Conditions to Authorizations and Licenses (Petition) on behalf of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee).¹ Through this Petition, and pursuant to section 1.41 of the Commission’s Rules, the Committee advises the Commission that it has no objection to the Commission approving the above-captioned application, provided that the Commission conditions its approval on the assurance of Telesat Canada (Telesat) and

¹ Exec. Order No. 13913, § 9(h), 85 Fed. Reg. 19643, 19647-48 (2020). The Executive Order directs the Committee to “assist the [Commission] in its public interest review of national security and law enforcement concerns that may be raised by foreign participation in the United States telecommunications services sector.” *Id.* § 3(a), 85 Fed. Reg. at 19643.

subsidiaries (Skynet Satellite Corp., Telesat Network Services, Inc., and Infosat Able Holdings, Inc.) to abide by the commitments and undertakings set forth in the July 15, 2021, Letter of Agreement (LOA), a copy of which is attached hereto.²

Pursuant to section 214(a) of the Communications Act, the Commission must determine whether a proposed transfer of control of any section 214 authorization will serve the public interest, convenience, and necessity.³ As part of the public interest analysis, the Commission considers whether any such application raises national security, law enforcement, foreign policy, or trade policy concerns related to the applicant's foreign ownership.⁴ With regard to these concerns, the Commission has long sought the expertise of the relevant Executive Branch agencies and has accorded deference to their expertise when they have identified such concerns in a particular application.⁵

After discussions with representatives of Telesat and subsidiaries in connection with the above-captioned application, the Committee has concluded that the additional commitments set forth in the LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities.

² 47 C.F.R. § 1.41.

³ 47 U.S.C. § 214(a); *Applications of Cable & Wireless Plc and Columbus New Cayman Limited for Transfer of Control of Cable Landing Licenses and Section 214 Authorizations*, Memorandum Opinion and Order, 30 FCC Rcd 12730, 12734, ¶ 8 (2015).

⁴ *See Market Entry and Regulation of Foreign-affiliated Entities*, Report and Order, 11 FCC Rcd 3873, 3888, ¶¶ 38-39 (1995).

⁵ *Id.* at 3888, ¶ 39.

Accordingly, the Committee advises the Commission that it has no objection to the Commission granting the above-captioned application, provided that the Commission conditions its consent on compliance with the July 15, 2021, LOA attached to this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kathy Smith", written in a cursive style.

Kathy Smith
Chief Counsel

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