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U.S. Department of Justice

Federal Bureau of Investigation

Office of the General Counsel

Washington, D.C. 20535  
October 16, 2002

By Hand Delivery

James Ball  
Chief, Policy Division  
International Bureau  
Federal Communications Commission  
445 12th St., SW  
Washington, D.C. 20554

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OCT 22 2002

Policy Division  
International Bureau

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Federal Communication Commission  
Bureau/ Office

**Re:    Application of Lockheed Martin, et al., and Intelsat, Ltd., et al., for Assignment of Licenses  
Concerning COMSAT World Systems (IB Docket No. 02-87)**

Dear Mr. Ball

Transmitted hcrewith, on behalf of the Department of Justice ("DoJ") and the Federal Bureau of Investigation ("FBI"), a copy of a the Letters exchanged between John B. Reynolds, III, counsel for COMSAT Corporation and Intelsat Global Service Corporation on the one hand and the DoJ and the FBI on the other, filed with the Federal Communications Commission's Office of the Secretary, and sent by electronic mail to the Federal Communications Commission's International Bureau on October 15, 2002, and a copy of the Certificate of Service tiled with the Federal Communications Commission's Office of the Secretary on October 16, 2002, regarding the above-referenced matter.

Sincerely,

Myla R. Saldivar-Trotter  
Technology Law Unit  
Office of the General Counsel  
202-324-1730

Enclosures



U.S. Department of Justice

Federal Bureau of Investigation

Office of the General Counsel

Washington, D.C. 20535

October 15, 2002

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Policy Division  
International Bureau

John B. Reynolds, III  
Wiley Rein & Fielding LLP  
1776 K. St., NW  
Washington, DC 20006

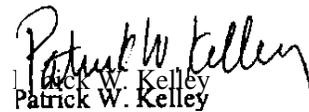
Re: Application of Lockheed Martin, et al., and Intelsat, Ltd., et al., for Assignment of Licenses Concerning Comsat World Systems (IB Docket No. 02-87)

Dear Mr. Reynolds:

Thank you for your letter of October 15, 2002 memorializing the substance of our recent discussions. The Federal Bureau of Investigation (FBI) and the Department of Justice (DOJ), in reliance upon the representations made by you on behalf of COMSAT Corporation and Intelsat Global Service Corporation, in our discussions and those in your letter, have decided not to file an objection or other comments with the Federal Communications Commission (other than copies of your letter and a cover sheet) regarding the above referenced pending applications. As agreed previously, should there be any material change in the facts as represented in your letter of October 15, 2002, we understand that you or other representatives of COMSAT Corporation or Intelsat Global Service Corporation, will notify us in writing.

We appreciate the cooperation extended by COMSAT Corporation and Intelsat Global Service Corporation, in assisting the DOJ and the FBI in addressing our law enforcement and national security responsibilities.

Sincerely,

  
Patrick W. Kelley  
Deputy General Counsel

cc Richard Salgado, DOJ

Jeffrey D. McLauchlan  
President  
COMSAT Corporation

Ramu V. Potarazu  
President and Chief Operating Officer  
Intelsat Global Service Corporation



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October 15, 2002

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**Policy Division  
International Bureau**

James Lovelace, **Esq.**  
Chief, Technology Law Unit  
Office of the General Counsel  
Federal Bureau of Investigation  
Room 7877 FBI Building  
935 Pennsylvania Avenue, N.W.  
Washington, D.C. 20535-0001

Re:    Application of Lockheed Martin, et al., and Intelsat, Ltd., et al., for  
Assignment of Licenses Concerning Comsat World Systems (IB Docket  
No. 02-87)

Dear Mr. Lovelace:

On behalf of our clients, COMSAT World Systems (“CWS”), a business unit of Lockheed Martin Corporation (“Lockheed Martin”) and Intelsat Ltd., we appreciate the opportunity to confer with representatives of the Federal Bureau of Investigation (“FBI”) and the Department of Justice (“DOJ”) about Intelsat’s proposed acquisition of the assets of CWS. This letter responds to your request for certain information about CWS’s business and its current Federal Communications Commission (“FCC”) authorizations, and for certain advance notice commitments related to potential new services.

**I. Introduction**

Lockheed Martin, COMSAT Corporation, and COMSAT Digital Teleport, Inc. (“CDTI”) (collectively “COMSAT”), together with Intelsat, Ltd., Intelsat (Bermuda), Ltd., Intelsat USA License Corp. (“Intelsat USA”), and Intelsat LLC (collectively “Intelsat”), have submitted to the FCC an application for the approval of COMSAT’s assignment of certain Title II common carrier authorizations to Intelsat USA and certain Title III radio licenses to Intelsat LLC. These assignments

<sup>1</sup> Wiley Rein & Fielding LLP represents both parties with respect to the FCC regulatory aspects of the transaction, as well as matters that concern the Committee on Foreign Investment in the United States (“CFIUS”). Both parties have signed this letter, acknowledging and agreeing to its contents and the commitments made herein. Each party, however, makes the representations in this letter only with respect to facts or actions that are known to it or are or will be under its control. As of the closing of the proposed transaction, CWS will cease to exist as an operating business unit.

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will be carried out in connection with Intelsat's proposed acquisition<sup>4</sup> of the assets of CWS and certain associated COMSAT business enterprises.

As explained in more detail below, Intelsat provides bulk communications capacity via the Intelsat satellite fleet, marketed primarily through more than 300 official distributors and wholesale customers and also through Intelsat's own nascent marketing operation. CWS is a major reseller of Intelsat's satellite capacity and has extensive experience in marketing and network management as it relates to satellite capacity. The combination of Intelsat and CWS will allow Intelsat to provide bulk space capacity and the value-added services currently provided by CWS, none of which include common carrier switched services, as described below.

## **II. Description of the Parties and the Transaction**

### ***A. Intelsat***

Intelsat owns and operates a global satellite system that provides bulk space segment capacity to other companies for a wide array of communications services, including voice, video, data, and Internet connections. The Intelsat fleet of satellites offers this capacity in approximately 200 countries and territories, serving customers that range from large telecommunications carriers and broadcasters to corporate networks and Internet service providers. These customers include distributors, such as COMSAT, that resell bulk satellite capacity, as well as customers that lease satellite capacity for their own use. Historically, because Intelsat was an inter-governmental organization, it could not hold FCC licenses and authorizations. As a result of its recent privatization, Intelsat has been able to obtain satellite licenses that authorize it to operate the Intelsat satellite fleet. Nevertheless, Intelsat does not currently hold any Section 214 authorizations, and is therefore not authorized to provide international common carrier switched services.

### ***B. CWS***

CWS is a business unit of COMSAT Corporation, a wholly owned subsidiary of Lockheed Martin Global Telecommunications LLC, which in turn is a wholly owned subsidiary of Lockheed Martin. The vast majority of CWS's customers

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<sup>2</sup> The licenses that COMSAT proposes to assign to Intelsat are held by CDTI and COMSAT General Corporation ("CGC"), as well as COMSAT Corporation.

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lease satellite capacity only—CWS merely supplies to the customer capacity on transponders affixed to Intelsat's satellites to transport various communications, including voice, data and video. Although CWS provides certain network management services with respect to the satellite capacity itself, it does not offer any common carrier switching or routing services, so a customer must obtain such services, if required, from other sources. In addition, because the capacity-only service offered by CWS does not include the use of any earth stations owned or operated by COMSAT,<sup>3</sup> a customer must secure earth station services separately to downlink the data stream from Intelsat's satellites. Thus, all of CWS's common carrier customers obtain their own Section 214 authorizations, and most of CWS's customers apply for and obtain their own Title III licenses from the FCC.

CWS, through COMSAT's CDTI subsidiary, also offers three types of value-added teleport services, none of which involves any common carrier switching or routing. These services, which comprise only a fraction of CWS's business as compared to the bulk capacity services, are very similar and differ only in the degree of responsibility accepted by CWS with respect to the transportation of a customer's stream of data.

First, CWS offers an "earth station" service, which, in addition to the transportation of the data stream to an Intelsat satellite for distribution to an appropriate foreign earth station, consists of the use of one of COMSAT's three earth stations. A customer who purchases the earth station service is responsible for supplying a single data circuit to one of COMSAT's earth stations.

As with all other services provided by CWS, the customer (or Intelsat's customer, in the case of services provided to Intelsat) is responsible for having the data processed, including any necessary switching or routing, prior to turning the data stream over to CWS. Once CWS has uplinked the data stream to Intelsat's satellite,

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<sup>3</sup> COMSAT owns or operates earth stations in Clarksburg, MD, Santa Paula, CA, and Paumotu, HI. In addition, COMSAT owns or operates an earth station in Bethesda, MD, which is used solely for test and demonstration purposes and is not used to carry any third-party traffic or provide common carrier switching or routing services. These licenses will be transferred to Intelsat as part of the purchase agreement. Finally, CWS holds the licenses for Intelsat's earth stations at the Intelsat building in Washington, D.C. COMSAT holds these licenses on behalf of Intelsat because Intelsat, prior to privatization, could not be a licensee. COMSAT is awaiting regulatory approval to assign these licenses to Intelsat.

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either the customer or a carrier at the foreign earth station becomes responsible for any necessary switching or routing.

Second, the "international private bulk capacity" service is a dedicated point-to-point private interconnection service. For this small class of customers, CWS agrees to transport an already-processed data stream from a domestic point chosen by the customer, through a COMSAT earth station, to an Intelsat satellite or a foreign earth station, and *vice versa*. CWS is therefore responsible for both the transportation between a domestic point and its earth station, and the transportation to the satellite or the foreign earth station. The customer, however, remains responsible for any necessary switching or routing. This service is provided solely on a non-common carrier basis

Finally, CWS offers "Internet connectivity" service, which is a special case of the "international private bulk capacity" service. This non-common carrier service is provided to foreign Internet Service Providers ("ISPs") who **seek** to interconnect with U.S. domestic ISPs. The domestic ISPs, in turn, own routers located inside CWS's earth station at Clarksburg, MD. CWS merely accepts data circuits from the ISPs' routers and, as with all other CWS services, serves as a conduit for transporting data between the domestic and the foreign ISPs. Included in the "Internet connectivity" service is a "quality of service" control, which requires CWS to monitor bandwidth utilization and circuit availability. Again, CWS does not perform any common carrier switching or routing for its "Internet connectivity" customers.

In short, while it offers transponder capacity and three types of value-added services to meet the needs of international telecommunications service providers, long-distance carriers, broadcasters, and multinational corporations, CWS does not itself provide any common carrier switched services. Moreover, CWS's existing Section 214 Authorizations do not authorize the provision of any international common carrier switched services.

### ***C. The Transaction and the Related Ownership Structure***

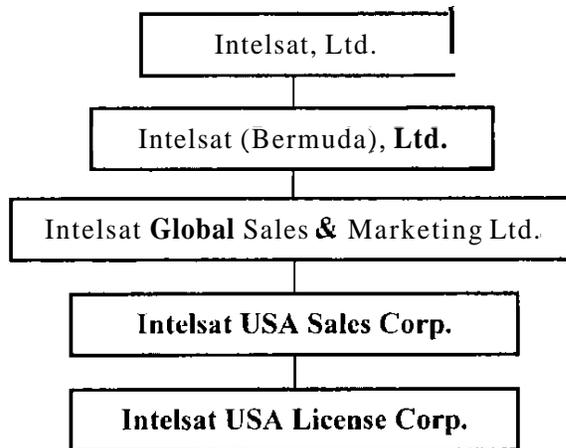
COMSAT and its subsidiaries hold in good standing several FCC Title III licenses and Section 214 authorizations relating to the assets proposed to be transferred to Intelsat. Upon the closing of the proposed transaction, these licenses and authorizations will be assigned to one of several wholly owned subsidiaries of

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Intelsat, Ltd. The relevant subsidiaries for purposes of this letter are Intelsat **USA**, which will receive the Section 214 authorizations, and Intelsat LLC, which will receive the Title III licenses.

The proposed ownership structure for the Section 214 authorizations and Title III licenses is nearly identical, as described below.

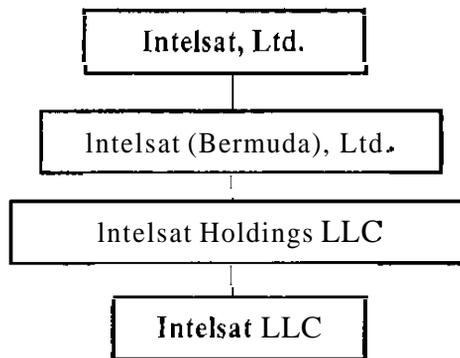
*1. Corporate Structure of the Proposed Holder of Section 214 Authorizations:*



Intelsat USA, the proposed holder of the Section 214 authorizations in this transaction, is a Delaware corporation with a holding company ownership structure similar to that of Intelsat LLC, described below. Intelsat **USA** is wholly owned and controlled by Intelsat **USA** Sales Corp., a Delaware corporation. Intelsat **USA** Sales Corp., in turn, is wholly owned by Intelsat Global Sales & Marketing Ltd., a company incorporated under the laws of England and Wales. Intelsat Global Sales & Marketing Ltd., in turn, is wholly owned by Intelsat (Bermuda), Ltd., a company incorporated under the laws of Bermuda. Intelsat (Bermuda), Ltd. is wholly owned by Intelsat, Ltd., also a company incorporated under the laws of Bermuda.

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## 2. Corporate Structure of the Proposed Title III Licensee



Intelsat LLC, the proposed Title III licensee in this transaction, already holds the Intelsat satellite licenses. It is a Delaware limited liability company with a holding company ownership structure common to U.S.-licensed international satellite systems.<sup>4</sup> Intelsat LLC is wholly owned and controlled by Intelsat Holdings LLC, also a Delaware limited liability company. Intelsat Holdings, in turn, is wholly owned by Intelsat (Bermuda), Ltd., which itself is a wholly owned subsidiary of Intelsat, Ltd.; as noted above, the latter two entities are both Bermuda companies.

## 3. Controlling shareholders

Lockheed Martin, which is publicly traded on the New York Stock Exchange, is by far the largest single shareholder in Intelsat, Ltd. Lockheed Martin holds approximately 24.05 percent of the total Intelsat, Ltd. shares through COMSAT Corporation and related COMSAT business entities.<sup>5</sup> The proposed transaction will not affect Lockheed Martin's current ownership stake in Intelsat, Ltd., and, upon

<sup>4</sup> A number of U.S.-licensed international telecommunications companies are organized as holding companies, including Loral Space and Communications Limited and SES Global, S.A.

<sup>5</sup> Although Lockheed Martin has for various reasons decided *to* exit the business of providing global commercial telecommunications services, this decision has not affected its current investment in Intelsat; in fact, Lockheed Martin's ownership share in Intelsat has increased slightly since August 2000.

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completion of the transaction, Lockheed Martin will remain, by a wide margin, the largest single shareholder in Intelsat, Ltd.

The second largest Intelsat shareholder owns less than 5.5 percent of the total shares,<sup>6</sup> and the remaining ownership interests in Intelsat are widely dispersed among more than 220 entities, representing over 145 nations. The ownership of Intelsat has not materially changed during the past two years. However, as the DOJ is well aware, Intelsat has already privatized and is under a statutory obligation to conduct an initial public offering. Consequently, Intelsat has filed its Registration Statement on Form F-1 with the United States Securities and Exchange Commission.'

### **IJI. Section 214 Common Carrier Authorizations**

COMSAT, on behalf of its CWS business unit, holds authorizations pursuant to Section 214 of the Communications Act of 1934 to lease channels of Intelsat's bulk space capacity, as described in detail above. However, while CWS leases space capacity that its customers may use to provide switched services, CWS does not itself provide any common carrier switched services. In addition, although CWS is authorized to lease Intelsat space capacity between the United States and foreign points, its FCC authorizations do not permit it to provide international common carrier switched services without first obtaining Section 214 authorizations for that purpose

CWS, through CDTI, also provides teleport services, as described in detail above. Nevertheless, these services are not subject to Section 214 of the Communications Act because they are not offered as common carrier services. These services also do not involve any common carrier switching or routing.'

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<sup>6</sup> Videsh Sanchar Nigam Ltd. of India owns approximately 5.41 percent of the outstanding Intelsat, Ltd. shares. The third largest shareholder, France Telecom, owns approximately 4.23 percent of the shares, and Telenor Broadband Services and British Telecommunications, who are the fourth and fifth largest shareholders, own approximately 4.11 and 3.83 percent of the outstanding shares, respectively.

<sup>7</sup> Registration Statement Under the Securities Act of 1933, Intelsat, Ltd., Registration No. 333-87064 (April 26, 2002) and Amendment No. 1 thereto, dated June 21, 2002.

<sup>8</sup> CDTI provides certain Operation & Management ("O&M") services at earth stations in Culpepper, VA, and in Clarksburg, MD. The O&M services consist of repairing antennae as needed

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**As** described above, while CWS does not provide any common carrier switching or routing, it offers its customers access to satellite capacity over the Intelsat satellite fleet. CWS's customers, who are responsible for any necessary data processing, including switching and routing, use the capacity to distribute voice, video, and other services. Certain customers **are** telecommunications carriers and do use the Intelsat satellite capacity to provision common carrier switched services to the public. Nevertheless, CWS does not provide or control these services or switch such traffic. CWS merely provides access to the in-orbit satellite facilities and, occasionally, its earth stations, and the carriers providing the actual switched services to the public must seek and obtain FCC authorizations and licenses, as required. Importantly, the carriers' use of Intelsat satellite capacity for the provision of communications services does not provide CWS or Intelsat with any special ability to access the communications that these carriers distribute.

With this background, COMSAT notes that it holds the Section 214 authorizations listed in Attachment **A** to this letter.

#### **IV. Title III Radio Licenses**

COMSAT and associated business enterprises hold radio communications licenses issued by the FCC under Title III of the Communications Act. CWS does not provide, and has no plans to provide, common carrier switched services via equipment authorized under its Title III licenses prior to closing. Likewise, Intelsat has no plans to provide such services post-closing. The parties believe, however, that they would not need to seek additional Title III licenses to offer international common carrier services. Nevertheless, in the unlikely event that CWS or Intelsat were to decide to provide common carrier switched services in the future, they would expect to seek the requisite additional Section **214** authorization from the FCC. Importantly, as described above, most of CWS's customers obtain their own Title III licenses from the FCC, and all of CWS's customers that offer common carrier switched services to the public are required to obtain their own Section 214 authorization from the FCC.

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(Continued.. .)

and do not involve special access to **any** data or other communications traffic. Consequently, COMSAT does not provide, or have access to, **any** common carrier switched or routing **services as part** of the O&M services.

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\* \* \*

In summary, CWS is in the business of providing access to Intelsat's satellite capacity for use by others to distribute communications services, and both Intelsat's and CWS's facilities and equipment are designed for this purpose. Neither Intelsat nor CWS has any control over the switching or routing performed by their customers. As a consequence, it seems unlikely that law enforcement or other U.S. governmental authorities would find it useful to work through either Intelsat or CWS to address surveillance concerns and related matters with respect to traffic that relies on Intelsat satellites or CWS services. In the event that there is a need to conduct lawfully authorized surveillance on Intelsat facilities or services, Intelsat and COMSAT will take all reasonable measures to assist and support the FBI or any other United States federal, state or local agency with law enforcement or national security responsibilities in conducting lawfully authorized electronic surveillance. Such assistance shall include, but not be limited to, disclosure, if necessary, of technical and engineering information relating to the design, maintenance or operation of the Intelsat system. Intelsat or COMSAT and the agency seeking the cooperation will work together in determining what is reasonable, taking into account the investigative needs of the agency and Intelsat and COMSAT's commercial interests.

Intelsat undertakes to provide the FBI and DOJ with advance notice of the use of any of the transferred assets to provide common carrier switched services. For any future service requiring a Section **214** authorization, Intelsat will provide the FBI and DOJ a copy of any application filed with the FCC. For any future common carrier switched service, like domestic U.S. switched service, that may be provided without obtaining a new Section 214 authorization, Intelsat will notify the FBI or DOJ **30** days before offering any such service. Similarly, Intelsat will notify the FBI or DOJ 30 days in advance of beginning to use any of the equipment subject to transferred Title III licenses for the provision of common carrier switched services.

CWS and Intelsat believe that the proposed transaction does not involve any national security risks or interests. They do not, therefore, plan to submit a notification concerning the pending acquisition of CWS by Intelsat to the CFIUS under Section 721 of the Defense Production Act (the Exon-Florio Amendment).

James Lovelace, Esq.  
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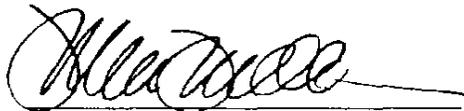
Please contact me if you require any further information. Thank you for your attention to this matter.

Sincerely,

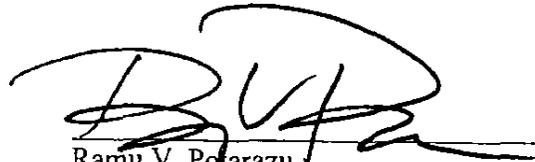


John B. Reynolds, III

Acknowledged and agreed by.



Jeffrey D. MacLauchlan  
President  
COMSAT Corporation



Ramu V. Polarazu  
President and Chief Operating Officer  
Intelsat Global Service Corporation

Attachment

cc Richard P. Salgado, Esq. - U.S. Department of Justice

WRFMAJN 1180105 I

**ATTACHMENT A**

**SECTION 214 AUTHORIZATIONS (as of 10/10/02)**

<b>CALL SIGN FILE NO.</b>	<b>CAPTION ON ORDER</b>	<b>AUTHORIZATION HOLDER</b>	<b>AUTHORIZATION STATUS/ FCC/DA NO.</b>	<b>DATE GRANTED</b>
IPC-50	Application of Communications Satellite Corporation; For authority to provide satellite television services directly to users at United States earth stations.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Jan. 30, 1980); 76 FCC 2d 5; 1980 FCC LEXIS 102	Jan. 30, 1980
CSS-81-003-P	COMMUNICATIONS SATELLITE CORPORATION, Application for authority to participate in an INTELSAT program for the procurement of three additional modified INTELSAT V satellites to be used as a part of the INTELSAT communications satellite system.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Aug. 6, 1982); 91 FCC 2d 197; 1982 FCC LEXIS 503	Aug. 6, 1982
IPC-83-008; Transmittal No 428 and 431	COMMUNICATIONS SATELLITE CORPORATION, Application for authority to provide satellite communications service to non-carriers at all <b>U.S.</b> international earth stations; COMMUNICATIONS SATELLITE CORPORATION, Revisions to Tariff FCC No. 101	Communications Satellite Corporation	Memorandum Opinion and Order (Jan. 27, 1983); 93 FCC 2d 66; 1983 FCC LEXIS 624	Jan. 27, 1983
CSS-82-001-P	In the Matter of COMMUNICATIONS SATELLITE CORPORATION; Application for authority to participate in the construction of INTELSAT VI communications satellites to be used as part of the INTELSAT global satellite system.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (May 23, 1984); 1984 FCC LEXIS 2660	May 23, 1984

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTEI
ITC-84-150	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION; For authority pursuant to Section 401 of the Communications Satellite Act of 1962, as amended, to obtain units of utilization from INTELSAT and pursuant to Section 214 of the Communications Act of 1934, as amended, to establish channels of communication for the purpose of providing international business satellite space segment services between earth stations in the United States and INTELSAT satellites over the Atlantic Ocean	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Sept. 11, 1984); 1984 FCC LEXIS 1987	Sept. 11, 1984
ITC-85-086	In the Matter of COMMUNICATIONS SATELLITE CORPORATION; Application for authority, pursuant to Section 214 of the Communications Act of 1934, to install and operate communications equipment at the Andover, Maine (WA20) earth station for use in deriving channels of communication for Rural Communications Services.	Communications	Order and Authorization (July 15,	July 15, 1985
ITC-85-160	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION; For authority pursuant to Section 401 of the Communications Satellite Act of 1962, as amended to obtain units of utilization from INTELSAT and pursuant to Section 214 of the Communications Act of 1934, as amended, to establish channels of communications for the provision of Datanet space segment services.	Communications Satellite Corporation	Order and Authorization (July 18, 1985); 1985 FCC LEXIS 2901	July 18, 1985

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
ITC-86-025	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION; For such authority as may be necessary for it to participate in a program to modify the INTELSAT VB (F-13) and (F-15) satellites and the INTELSAT VI (F-4) and (F-5) satellites.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (April 10, 1986); 1986 FCC LEXIS 3635	April 10, 1986
ITC-86-109	In the Matter of COMMUNICATIONS SATELLITE CORPORATION; Application for Authority to Participate in a Program to Modify One or More INTELSAT VI Spacecraft to Provide Enhanced K-band Coverage.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Oct. 6, 1986); 1 FCC Rcd 156: 1986 FCC LEXIS 2518	Oct. 6, 1986
ITC-88-006	In the Matter of COMMUNICATIONS SATELLITE CORPORATION; Application for authority to provide satellite services between the United States and Cuba	Communications Satellite Corporation	Order (June 30, 1988); 3 FCC Rcd 4423; 1988 FCC LEXIS 1325	June 30, 1988
ITC-88-207; CSG-88-090-P/L	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION For the Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Establish Channels of Communication between an Earth Station at United Nations Headquarters In New York and Overseas Points; COMMUNICATIONS SATELLITE CORPORATION For Authority to Act as Licensee of an Eleven Meter INTELSAT Standard G Earth Station at the United Nations Plaza in New York.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Dec. 23, 1988); 4 FCC Rcd 569: 1989 FCC LEXIS 46	Dec. 23, 1988

<b>CALL SIGN FILE NO.</b>	<b>CAPTION ON ORDER</b>	<b>AUTHORIZATION HOLDER</b>	<b>AUTHORIZATION STATUS/ FCC/DA NO.</b>	<b>DATE GRANTED</b>
CSS-88-005	In the Matter of COMMUNICATIONS SATELLITE CORPORATION; For such authority as may be necessary in order for it to participate in a program for the construction of high power INTELSAT VII series communications satellites and procurement of appropriate launch vehicles to be used as part of the INTELSAT global satellite system.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Jan. 11, 1990); 5 FCC Rcd 753; 1990 FCC LEXIS 701; 67 Rad. Reg. 2d (P&F) 546	Jan. 11, 1990
CSs-89-004	In the Matter of COMMUNICATIONS SATELLITE CORPORATION For authority to participate in an INTELSAT program involving the possible acquisition of additional satellite capacity in one or more of the three ocean regions.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (Aug. 28, 1990); 5 FCC Rcd 5952; 1990 FCC LEXIS 5573; 68 Rad. Reg. 2d (P&F) 600	Aug. 28, 1990
ITC-87-097	In the Matter of COMMUNICATIONS SATELLITE CORPORATION Application for authority to establish channels of communication for the provision of space segment services to all earth stations at various foreign points.	Communications Satellite Corporation	Order and Authorization (May 15, 1991); 6 FCC Rcd 2891; 1991 FCC LEXIS 2899	May 15, 1991
ITC-91-024	In the Matter of COMMUNICATIONS SATELLITE CORP. Application for authority to provide cable restoration services between the U.S. Mainland and Puerto Rico and the U.S. Virgin Islands.	Communications Satellite Corporation	Order and Authorization (Dec. 24, 1991); 7 FCC Rcd 50; 1991 FCC LEXIS 6857	Dec. 24, 1991

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
TC-91-215-A TC-92-041 TC-92-047 TC-92-074	In the Matter of US SPRINT COMMUNICATIONS COMPANY Amended Application for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Acquire and Operate Facilities for Service to Vietnam; AMERICAN TELEPHONE AND TELEGRAPH COMPANY For Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Acquire and Operate 60 Circuits in the TAT-6 Cable System, Extended via Terrestrial Transit Facilities to an Earth Station in France and Further Extended via an Appropriate INTELSAT IOR Satellite and to Acquire and Operate 150 Circuits from an AT&T Earth Station on the West Coast of the United States via an Appropriate POR INTELSAT Satellite to Reestablish Service Directly Between Points in or Reached via Both the United States and Vietnam; COMMUNICATIONS SATELLITE CORPORATION for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to establish channels of communication for the provision of common carrier service between the United States and Vietnam; MCI TELECOMMUNICATIONS CORPORATION For Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Acquire and Operate Facilities for the Provision of Its Authorized Common Carrier Services Between the United States and Vietnam	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (April 24, 1992); 7 FCC Rcd 2891: 1992 FCC LEXIS 2355	April 24, 1992

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCCIDA NO.	DATE GRANTED
css-90-001	In the Matter of COMMUNICATIONS SATELLITE CORPORATION For Authority of Participant in an INTELSAT program involving the Construction of Additional INTELSAT VII Satellites and the Procurement of Appropriate Launch Vehicles.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (May 18, 1992); 7 FCC Rcd 3430; 1992 FCC LEXIS 2970; 70 Rad. Reg. 2d (P&F) 1599	May 18, 1992
ITC-92-144	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION, For the authority pursuant to Section 214 of the Communications Act of 1934, as amended, to establish and operate channels of communications for use in the provision of common carrier space segment service between the United States and all earth stations on Guam and American Samoa.	Communications Satellite Corporation	Memorandum, Opinion, Order and Authorization (Aug, 7, 1992); 7 FCC Rcd 5270; 1992 FCC LEXIS 4691	Aug. 7, 1992
ITC-92-141	In the Matter of the Application of COMMUNICATIONS SATELLITE CORPORATION, For the authority pursuant to Section 214 of the Communications Act of 1934, as amended, to provide satellite services between the United States and Cuba.	Communications Satellite Corporation	Memorandum, Opinion, Order and Authorization (Jan. 21, 1993); 8 FCC Rcd 122; 1993 FCC LEXIS 477; 72 Rad. Reg. 2d (P&F) 58	Jan. 21, 1993
ITC-93-046	In the Matter of COMMUNICATIONS SATELLITE CORPORATION Application for authority to obtain units of utilization from INTELSAT and to establish channels of communications for the purpose of providing point-to-multipoint Datanet service between the United States mainland and the Commonwealth of Puerto Rico and between the U.S. mainland and the U.S. Virgin Islands on an Incidental Basis.	Communications Satellite Corporation	Order and Authorization (Feb. 19, 1993); 8 FCC Rcd 1578; 1993 FCC LEXIS 1033	Feb. 19, 1993

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
TC-93-134	In the Matter of COMMUNICATIONS SATELLITE CORPORATION, Application for authority to obtain units of utilization for INTELSAT and to establish channels of communication for the provision of point-to-multipoint Datanet service between the U.S. Mainland and the Commonwealth of Puerto Rico and between the U.S. Mainland and the U.S. Virgin Islands.	Communications Satellite Corporation	Order and Authorization (July 21, 1993); 8 FCC Rcd 5124; 1993 FCC LEXIS 3907	July 21, 1993
CSS-92-004	In the Matter of COMSAT Corporation, For Authority to Participate in a Program Involving Construction of Certain Additional INTELSAT Satellites, and Provision of Authorized Services.	COMSAT Corporation	Memorandum Opinion, Order and Authorization (Jan. 7, 1994); 9 FCC Rcd 327; 1994 FCC LEXIS 292	Jan. 7, 1994
ITC-94-272	In the Matter of COMSAT CORPORATION, Application for Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, to Provide Satellite Services for the Provision of Public Switched and Private Line Services Between the United States and Cuba.	COMSAT Corporation	Memorandum Opinion, Order and Authorization (July 29, 1994); 9 FCC Rcd 4037; 1994 FCC LEXIS 3979	July 29, 1994
ITC-94-351	In the Matter of COMSAT Corporation For authority pursuant to Section 214 of the Communications Act of 1934, as amended to establish channels of communications for the purpose of providing space segment services between the United States and overseas points.	COMSAT Corporation	Order and Authorization (Dec. 27, 1994); 10 FCC Rcd 1044; 1995 FCC LEXIS 639	Dec. 21.1994
TC-95-310	In the Matter of COMSAT CORPORATION Application for Authority Pursuant to Section 214 of the Communications Act of 1934, as amended to Provide Satellite Services for the Provision of Public Switched and Private Line Services Between the United States and North Korea.	COMSAT Corporation	Memorandm Opinion, Order and Authorization (July 31, 1995); 10 FCC Rcd 8590; 1995 FCC LEXIS 5 183	July 31, 1995

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
ITC-95-407	In the Matter of COMSAT CORPORATION Application for authority pursuant to Section 214 of the Communications Act 1934, as amended, to establish channels communication via INTELSAT satellites in the Atlantic Ocean Region between Andover, Maine and Coral Gables, Florida and between Andover, Maine and Silver Spring, Maryland on an incidental basis as an integral part of an international VSAT system.	COMSAT Corporation	Order and Authorization (March 8, 1996); 11 FCC Rcd 3576; 1996 FCC LEXIS 1456	March 8, 1996
ITC-96-173	In the Matter of COMSAT CORPORATION Application for authority pursuant to Section 214 of the Communications Act 1934, as amended, to establish channels communication via INTELSAT satellites in the Atlantic Ocean Region between a domestic transmit earth station located in New York, New York and domestic receive-only earth stations in New York, New York, Riverside, California, Houston, Texas, Orlando, Florida, and Philadelphia, Pennsylvania on an incidental basis as an integral part of an international digital television network.	COMSAT Corporation	Order and Authorization (Aug. 9, 1996); 11 FCC Rcd 9391; 1996 FCC LEXIS 4417	Aug. 9, 1996
CSS-95-002	In the Matter of COMSAT CORPORATION Application for authority to participate in a program for the lease of eleven 36 MHz units of C-band capacity from the Indian National Satellite System, Department of Space, on the INSAT-2E spacecraft and to provide its authorized INTELSAT services via these facilities.	COMSAT Corporation	Memorandum Opinion, Order and Authorization (Feb. 11, 1997); 1997 FCC LEXIS 832	Feb. 11, 1997

CALL SIGN FILE NO.	CAPTION ON ORDER	AUTHORIZATION HOLDER	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
CSS-93-009 (4)- A	In the Matter of COMSAT CORPORATION Application for authority to participate in a program for the construction of up to four INTELSAT VIII satellites and to provide its authorized INTELSAT services via these facilities.	Corporation	Authorization (Sept. 19, 1997); 12 FCC Rcd 15971; 1997 FCC LEXIS 5269	Sept. 19, 1997
CSS-93-009 (4)- A	In the Matter of COMSAT CORPORATION; Application for authority to participate in a program for the construction of up to four INTELSAT VIII satellites and to provide its authorized INTELSAT services via these facilities.	COMSAT Corporation	Memorandum Opinion, Order and Authorization (May 22, 1998); 13 FCC Rcd 25202; 1998 FCC LEXIS 2494	May 22, 1998
10010-CSS-MP- 80	COMMUNICATIONS SATELLITE CORPORATION; Application for Authority to participate in a program for the construction of three modified INTELSAT V satellites to be used as part of the INTELSAT communications satellite system.	Communications Satellite Corporation	Memorandum Opinion, Order and Authorization (adopted July 7, 1981)	July 14, 1981
ITC-MSC- 20011101-00550	In the Matter of Section 63.19 Application of COMSAT CORPORATION; For Authority under Section 214 of the Communications Act to Discontinue the Provision of Occasional-Use Television, Occasional-Use IBS and Part- Time IBS Services	COMSAT Corporation	Memorandum Opinion and Order (adopted December 17, 2001)	Dec. 17, 2001

## CERTIFICATE OF SERVICE

I, Myla R. Saldivar-Trotter, Federal Bureau of Investigation, hereby certify that on this 16th day of October, 2002, I caused a true and correct copy of the foregoing **Letters exchanged between John B. Reynolds, III, Counsel for COMSAT Corporation and Intelsat Global Service Corporation, and the Department of Justice and Federal Bureau of Investigation, filed with the Federal Communication Commission's Office of the Secretary, and sent by electronic mail to the Federal Communications Commission's International Bureau, on the 15th day of October, 2002,** to be served via hand delivery (indicated by \*) or by mail to the following parties:

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