

December 9, 2004

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW., Room TW-A325  
Washington, DC 20554

Re: Request for Declaratory Ruling and Application for Transfers of Control, IB Docket No. 04-366 (Intelsat-Zeus)

IB File Nos. SAT-T/C-20040903-00167; SES-T/C-20040903-01332; SES-T/C-20040903-01331; SES-T/C-20040903-01330; SES-T/C-20040903-01328; SAT-T/C-20040903-00166; ITC-T/C-20040907-00357; ITC-T/C-20040907-00356; ISP-PDR-20040907-00008; ITC-T/C-20041119-00458; SES-T/C-20041119-01718  
WTB File No. 0001855699  
OET File No. 0030-EX-TU-2004

Dear Ms. Dortch:

Zeus Holdings Limited (“Zeus”), by its attorneys, hereby supplements the above referenced applications and Request for Declaratory Ruling in response to questions posed by the staff of the International Bureau of the Federal Communications Commission (“FCC”).

*1. Please identify the principal place of business for each of the limited partners in Apax Europe V GP, L.P.*

All of the limited partners of Apax Europe V GP, L.P. (“Europe V GP”) are individuals. Limited partners that are U.S. citizens account for approximately 6.3% of the equity of Europe V GP, with the remaining 93.7% of the equity of Europe V GP owned by citizens of WTO-member states.

*2. Please identify the source of the Private Equity Funds’ authority to each designate one of the four directors of Zeus Holdings Limited.*

A shareholders agreement to be entered into between Zeus Holdings Limited and the Private Equity Funds (as such term is defined in the Consolidated Application) concurrent with or immediately prior to the closing of the proposed transaction codifies the Private Equity Funds’ authority to each designate one of the four Zeus Holdings Limited directors.

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Please do not hesitate to contact us should you have any questions on this matter.

Sincerely,

/s/ Tom W. Davidson  
Tom W. Davidson  
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1333 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
Counsel for Zeus Holdings Limited

cc: Mr. Donald Abelson, Bureau Chief, International Bureau  
Mr. James Ball, Chief, Policy Division, International Bureau  
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Mr. Neil Dellar, Transaction Team, Office of General Counsel  
Ms. JoAnn Lucanik, Satellite Division, International Bureau  
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Bureau  
Mr. John Kennedy, Experimental Licensing Branch, Office of Engineering and Technology  
Ms. Susan O'Connell, Policy Division, International Bureau