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Ref: 10-28-05/DG-92

Julie A. Reese
Deputy Director General
& General Counsel

31 October 2005

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

Re: Notice of Ex Parte Presentation
IB Docket No. 05-290

Dear Ms. Dortch:

On 24 October 2005, the International Telecommunications Satellite Organization (ITSO) Director General and CEO, Ahmed Toumi; ITSO Deputy Director General and General Counsel, Julie Reese; and ITSO Director of External Affairs, Jose Toscano ("participants") met with Emily Willeford, Deputy Chief of Staff to Chairman Martin; Fred Campbell, Legal Advisor to Chairman Martin; Roderick Porter, Deputy Chief, International Bureau; Christopher Murphy, Chief, Multilateral Negotiations & Industry Analysis Branch; and John Martin, Senior Engineer, Satellite Division, International Bureau.

During the meeting, the participants presented the background of the restructuring of the Organization in 2001, including ITSO's supervisory role over Intelsat, Ltd.'s fulfillment of the public service obligations of global coverage and connectivity, serving lifeline connectivity ("LCO") customers, and non-discriminatory access. In particular, the participants noted the anticipated level of debt created by the proposed acquisition by Intelsat of PanAmSat Holding Corp., which potentially poses a risk for the continuity of these public services for developing countries should Intelsat face bankruptcy, reorganization or liquidation. In that regard, the participants urged that a legal mechanism be put in place whereby certain assets are preserved to ensure the continuity of public service obligations, including services to LCO countries. In addition, the participants requested assurances that the frequency assignments and orbital locations (Common Heritage) in the C- and Ku-band, which were transferred at the time of privatization to the United States as the Notifying Administration, are not transferred to another entity without due consideration of public service obligations. The participants also urged that the public service obligations be reinserted in the bylaws of the merged company.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Reese". The signature is written in a cursive style and is positioned over the word "Attachments:" in the following block.

Attachments: 24 October 2005 letter to U.S. Dept. of State, as Notifying Administration.

International Telecommunications Satellite Organization

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Ahmed Toumi
Director General and
Chief Executive Officer

Ref: 10-24-05/DG-84

24 October 2005

The Honorable David A. Gross
U.S. Coordinator, International Communications & Information Policy
U.S. Department of State
Washington, D.C. 20520-5820

Dear Ambassador Gross:

On behalf of the members of the ITSO Advisory Committee, which met in Washington, D.C. on 17-19 October 2005, I have the honor to transmit to you the following. You have before you, or may have before you in the immediate future, consideration of the proposed acquisition by Intelsat, Ltd. of PanAmSat Holding Corporation. This proposed transaction may have profound effects upon Intelsat customers and the governments which created Intelsat, and conditionally transferred assets to that new private company from the International Telecommunications Satellite Organization (now ITSO) in 2001.

As you review the proposed transaction, I would like to call your attention to the public service obligations that were accepted by Intelsat as an integral part of the privatization of the operating functions of the intergovernmental organization. These public service obligations include ensuring global connectivity and coverage, ensuring non-discriminatory access to the satellite system, and protecting customers with "lifeline" services. It is important to note that Intelsat has been entrusted with the public service obligations as a result of the unique character of the international decisions and privatization transactions that created the private company.

It is critical that these obligations undertaken by Intelsat be faithfully observed by the company that results from the merger of Intelsat and PanAmSat, as well as that legally-binding mechanisms are in place to ensure the continuity of public service obligations, notably in the case of bankruptcy or insolvency. I am concerned because questions persist about Intelsat's adherence to the public service obligations, including, for example, the lack of sufficient information provided to ITSO to enable ITSO to perform its supervisory functions or to analyze the compliance of Intelsat's annual calculation of the LCO Pricing Index with its obligations.

I am at your disposal to further discuss these issues with you.

Sincerely yours,

A handwritten signature in black ink, appearing to be "A. Toumi", written over a horizontal line.

cc: The Hon. Michael D. Gallagher, Asst. Secretary of Commerce/NTIA
The Hon. Kevin J. Martin, Chairman, U.S. Federal Communications Commission
The Hon. Thomas O. Barnett, Acting Assistant Attorney General for Antitrust,
U.S. Department of Justice

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