

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of

Constellation, LLC, Carlyle PanAmSat I,
LLC, Carlyle PanAmSat II, LLC, PEP
PAS, LLC, and PEOP PAS, LLC,
Transferors,

and

Intelsat Holdings, Ltd.,
Transferee,

Consolidated Application for Authority to
Transfer Control of PanAmSat Licensee
Corp. and PanAmSat H-2 Licensee Corp.

IB Docket No. 05-290

DA No. 05-2715

File Nos. SAT-T/C-20050930-00193
SAT-T/C-20050930-00194
SAT-T/C-20050930-01356
SAT-T/C-20050930-01357
SAT-T/C-20050930-01371

COMMENTS OF THE UNITED NATIONS

The United Nations (“UN”) files these comments in response to the Federal Communications Commission’s (“Commission”) public notice regarding the above referenced application (“Application”).¹ For the reasons stated below, the UN strongly supports the acquisition of PanAmSat Holding Corporation (“PanAmSat”) by Intelsat Holdings, Ltd. (“Intelsat”).

¹ *Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Seek FCC Consent to Transfer Control of Licenses and Authorizations Held by PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Public Notice, IB Docket No. 05-290, DA 05-2715 (Oct. 14, 2005).

I. BACKGROUND

One of the many important mandates of the UN is to maintain international peace and security. United Nations peacekeepers are now deployed around the world in near record numbers. The UN's Department of Peacekeeping Operations ("DPKO"), is tasked with the difficult, but critical, job of keeping the peace. The DPKO's mission is to plan, prepare, manage and direct UN peacekeeping operations, so that they can effectively fulfill their mandates under the overall authority of the Security Council and General Assembly, and under the command vested in the Secretary-General. The DPKO strives to provide the best possible and most cost-efficient administrative and logistical support to missions in the field through timely deployment of quality equipment and services, adequate financial resources and well-trained personnel.

The logistical support provided by the DPKO includes communications services. To that end, the DPKO purchases satellite capacity from Intelsat. The UN is, therefore, an interested party in the instant FCC proceeding.

II. THE ACQUISITION IS IN THE PUBLIC INTEREST

The UN strongly supports Intelsat's acquisition of PanAmSat because of the public interest benefits that the acquisition will bring. For example, combining Intelsat's and PanAmSat's fleets will increase the reliability of satellite services sold by the combined entity. As Intelsat and PanAmSat point out in the Application, the acquisition

will allow the combined fleet to be optimized to maximize back-up capabilities.² This ability to obtain more reliable service from a single vendor is extremely beneficial to customers like the DPKO, for which service reliability is critically important. In any given DPKO operation, lives can depend on the communications services relied upon by peacekeeping personnel.

In addition, the acquisition of PanAmSat by Intelsat will result in better geographic availability of satellite capacity. As with a military situation, the communications needs of the DPKO are not predictable and are subject to sudden change. Demand for communications connectivity tends to be heaviest in regions of conflict.

As such, the UN views as an important benefit the ability of the combined Intelsat-PanAmSat fleet to more efficiently utilize its satellite capacity in order to allow its coverage to be more responsive to customers' needs. If, for example, the combined fleet could, as described in the Application, relocate certain traffic in order to free up a steerable beam to be used to provide capacity in high-demand areas,³ it would greatly benefit the UN in its peacekeeping efforts. This, in turn, would promote the public interest by helping to maintain international peace and security.

² See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control, IB Docket No. 05-290 (filed Sept. 30, 2005) at 18.

³ See *id.* at 20.

III. CONCLUSION

For the reasons discussed above, the UN believes that the acquisition of PanAmSat by Intelsat is in the public interest. The UN therefore urges the Commission to grant the Application.

Respectfully submitted,

United Nations

/s/ Thomas Baxter

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November 14, 2005

CERTIFICATE OF SERVICE

I, Derrick Johnson, do hereby certify that on this 14th day of November, 2005, I sent, via electronic mail, a true and correct copy of the foregoing Comments of the United Nations to the following:

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