

**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 CONVERGENT MEDIA SYSTEMS CORPORATION

Convergent Media Systems Corporation ("Convergent") files these comments in response to the Federal Communications Commission's ("FCC") public notice regarding the above referenced application ("Application").¹ Convergent believes that the public interest will be served by the merger of PanAmSat Holding Corporation ("PanAmSat") into a subsidiary of Intelsat Holdings, Ltd. ("Intelsat").

Convergent is the leading provider of broadband platforms and services that deliver video-powered communications, live and on-demand, to employees, customers,

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).

and vendors throughout today's extended enterprises. For more than 25 years, Convergent has successfully helped world-class retail, financial and government clients transform their traditional communications into high-impact video-based corporate, marketing and distance learning programs. Convergent was a leader in the development of many industry "firsts," including:

- Implementation of the first business television network;
- Installation of the first Ku-band business television network;
- Sale of the first business television outsourcing agreement;
- Installation of the first 18" DBS business television network;
- Development of the first remote control software program for encryption databases; and
- Integration of the first interactive distance learning system.

Convergent purchases satellite capacity from PanAmSat and Intelsat that it uses in developing video networks for its customers. Convergent believes that the combination of Intelsat and PanAmSat will benefit satellite capacity purchasers such as Convergent in a variety of ways. For example, the combined Intelsat/PanAmSat fleet will result in additional restoration options to customers like Convergent, which, in turn, will increase the reliability of the system that Convergent is able to offer its customers. System reliability is critical to the end-user, and any action that increases such reliability is a benefit to both Convergent and its customers.

In addition, the combination of Intelsat's satellite fleet with PanAmSat's satellite fleet will allow the combined entity to offer customers such as Convergent increased geographic availability. This, in turn, provides Convergent with increased flexibility in

meeting its customers' connectivity needs, as many of those customers have facilities located throughout the world.

Finally, the combined Intelsat/PanAmSat entity will be able to offer its customers a broader array of technical services. Intelsat and PanAmSat have different sets of expertise. PanAmSat, for example, historically has been expert in systems integration, while Intelsat historically has excelled in providing bandwidth management services. Convergent will benefit from being able to access this broader array of knowledge and expertise within a single company post-merger.

For all of the reasons stated herein, Convergent believes that the merger of PanAmSat into Intelsat is in the public interest. Accordingly, the FCC should grant the Application.

Respectfully submitted,

Convergent Media Systems Corporation

by 

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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 Convergent Media Systems Corporation to the following:

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