

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Constellation, LLC, Carlyle PanAmSat I, LLC,)	IB Docket No. 05-290
Carlyle PanAmSat II, LLC, PEP PAS, LLC,)	
PEOP PAS, LLC)	DA No. 05-2715
Transferors,)	
)	SAT-T/C-20050930-00193
and)	SAT-T/C-20050930-00194
)	SAT-T/C-20050930-01356
Intelsat Holdings, Ltd.)	SAT-T/C-20050930-01371
Transferee)	
)	
Applications for Consent to Transfer Control)	
of Licenses and Authorizations Held by)	
PanAmSat Licensee Corp. and)	
PanAmSat H-2 Licensee Corp.)	
_____)	

COMMENTS OF BROADWING COMMUNICATIONS, LLC

Broadwing Communications, LLC (“Broadwing”), through its undersigned counsel, hereby files these comments in response to the Commission’s Public Notice seeking comment on Intelsat’s application for transfer of control of licenses held by PanAmSat (the “Intelsat/PanAmSat Application”).¹ Broadwing encourages the Commission to grant the Intelsat/PanAmSat Application because the acquisition of PanAmSat by Intelsat will provide significant benefits to the U.S. community of satellite users and companies like Broadwing.

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).

Broadwing is a provider of innovative telecommunications solutions to enterprises, carriers and government entities. Broadwing's one-of-a-kind, all-optical network enables the delivery of data, voice, video and high-capacity bandwidth services with unparalleled customer focus and speed. Broadwing has developed a Media Services Network that is exceptionally reliable, has an extremely low latency, and carries a "100 percent Quality of Service (QoS)" guarantee. Under the control of its Television Operations Center (TOC), the network supports the transport of high quality standard definition (SD) and high definition (HD) video and file transfer services for the collection and distribution of content to and from any of the 20 locations.

Broadwing has recently partnered with Intelsat to expand the capabilities of its Media Services Network by creating a hybrid terrestrial/satellite video distribution network. This service provides broadcasters with a seamless, high performance solution from the satellite to 20 major cities and top U.S. sports venues, and full flexibility of throughput options for SD and HD transmissions.

Broadwing is heartened by the prospect of a combined Intelsat/PanAmSat entity because the merged company will be able to offer better satellite back-up capability. Satellite services can be a risky business, with satellite failures occurring all too often. Unlike a fiber cut that can be fixed in a matter of hours, a satellite failure can take days or even months to remedy unless a spare satellite is already in orbit and readily available. A combined Intelsat/PanAmSat would increase the number of spare satellites available for back-up, and thereby improve the combined company's guarantees of service far beyond what either company could offer individually.

The Commission's staff has found in the past that the public interest is served when network reliability is increased as a result of a merger.² In this case, improving the reliability of Intelsat's satellite network serves the public interest by increasing the reliability of Intelsat's customers' networks, such as Broadwing's hybrid video distribution network. Broadwing's success and customer base has been built upon its reputation for offering the highest quality of service in the business. Therefore, Broadwing strongly supports any action that can help increase the reliability of its service offerings.

Broadwing also supports a combined Intelsat/PanAmSat entity because it will result in greater geographic availability of satellite services. With a larger fleet of satellites, the combined Intelsat/PanAmSat will be better able to quickly shift for customers dedicated capacity among regions. As a result, Broadwing in turn will be able to offer customers more flexibility and greater geographic availability of hybrid networks. In short, the combination of Intelsat and PanAmSat will benefit end-user customers of the hybrid satellite/terrestrial video distribution networks developed by Broadwing.

Finally, Broadwing does not foresee any anticompetitive effects resulting from this merger. Broadwing's own recent experience with the satellite market has led it to believe that competition is strong, and would not be diminished by the merger. In establishing its hybrid satellite/terrestrial video distribution network, Broadwing had a number of potential satellite providers beyond Intelsat and PanAmSat with whom it could

² See *Rig Telephones, Inc. d/b/a Datacom and Stratos Offshore Telephone Company (For Consent to Transfer Control of Microwave and Other Licenses)*, 15 FCC Rcd 19745, ¶25 (WTB 2000)(a merger was found to be in the public interest because it resulted in increased options for routing microwave transmissions, thereby resulting in more reliable microwave transmissions).

CERTIFICATE OF SERVICE

I, Alice Burruss, 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 from Broadwing Communications, LLC to the following:

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