

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 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 VIASAT, INC.**

In response to the Federal Communications Commission's ("Commission") public notice regarding the above referenced application,<sup>1</sup> ViaSat files these comments in support of the merger of PanAmSat Holding Corporation ("PanAmSat") into a subsidiary of Intelsat Holdings, Ltd. ("Intelsat").

ViaSat is a provider of satellite and other wireless communications equipment and services to both government and commercial markets. ViaSat's diverse product line includes VSAT equipment, antenna and gateway systems, consumer broadband

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<sup>1</sup> *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).*

equipment, mobile (airborne, maritime and ground) broadband systems, tactical radios, and tactical networking and information assurance devices.

ViaSat has a direct interest in this proceeding as both Intelsat and PanAmSat are customers of ViaSat's equipment. ViaSat believes that the continued innovation and investments in satellite communications technologies are necessary for satellite communication based services to remain competitive with terrestrial and other wireless solutions. Such continued innovation and investments are also necessary in order for satellite solutions to meet the pledge of providing affordable Internet broadband service for consumers nationwide. Intelsat has demonstrated a strong commitment to enhancing satellite communication services in the U.S. and abroad through its investment in WildBlue Communications as well as its employment of ViaSat's satellite consumer broadband equipment in the Middle East. The proposed merger should provide Intelsat with the increased scale, expertise and resources necessary to help continue drive necessary innovation in satellite communications in the U.S. and abroad.

ViaSat also has a direct interest in this proceeding as ViaSat purchases satellite capacity from both Intelsat and PanAmSat for use in private customer networks as well as for use in its shared-hub VSAT service business. The merger of PanAmSat into Intelsat should afford customers of the companies the benefit of a single entity that can offer greater geographic coverage flexibility because the combined satellite fleet will permit more efficient use of satellite spectrum. In particular, the merged company will be able to more easily alter its satellite beam configuration to create capacity in a geographic area where demand is higher. This is an important benefit to both commercial and government purchasers of satellite capacity in the U.S. and abroad.

For all of the above reasons, ViaSat believes that the merger of PanAmSat into Intelsat will further the public interest. Accordingly, ViaSat recommends that the Commission approve the merger.

**Respectfully submitted,**

**ViaSat, Inc.**

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**November 14, 2005**

**CERTIFICATE OF SERVICE**

I, [ ] do hereby certify that on this \_\_\_ day of November, 2005, I sent, via electronic mail, a true and correct copy of the foregoing Comments of ViaSat to the following:

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