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November 1, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Intelsat Holdings, Ltd. and Serafina Holdings Limited
Consolidated Application for Consent to Transfer Control of Holders of Title II
and Title III Authorizations, **IB Docket No. 07-181**

Dear Ms. Dortch:

On August 10, 2007, Serafina Holdings Limited (“Serafina”) and Intelsat Holdings, Ltd. (“Intelsat”) filed fourteen applications seeking Commission authority to transfer control of Intelsat to Serafina (the “Proposed Transaction”). The narrative entitled “Consolidated Application for Consent to Transfer Control” attached to each application included, as Diagram 1 of Attachment 3, an organizational chart depicting the anticipated post-closing ownership structure of Intelsat as of August 10, 2007. This chart did not include information with respect to the ownership structure of Intelsat’s subsidiaries, which was separately reported.

On October 24, 2007, we filed a letter with the Commission updating, in minor respects, certain information contained in the applications. In response, on October 29, 2007 staff from the Commission’s International Bureau requested that we submit a revised organizational chart reflecting this updated information as well as the ownership structure of Intelsat’s subsidiaries. We are submitting the requested chart as Attachment A hereto. Please note that, as was the case with the original Intelsat organizational chart, the direct equity interests in Serafina depicted in this chart do not add up to 100 percent. The remaining 5.26 percent of the direct equity in Serafina is subject to continuing syndication, as explained more fully in the applications and the parties’ October 24, 2007 letter to the Commission.

Please contact the undersigned should you have any questions.

Sincerely,

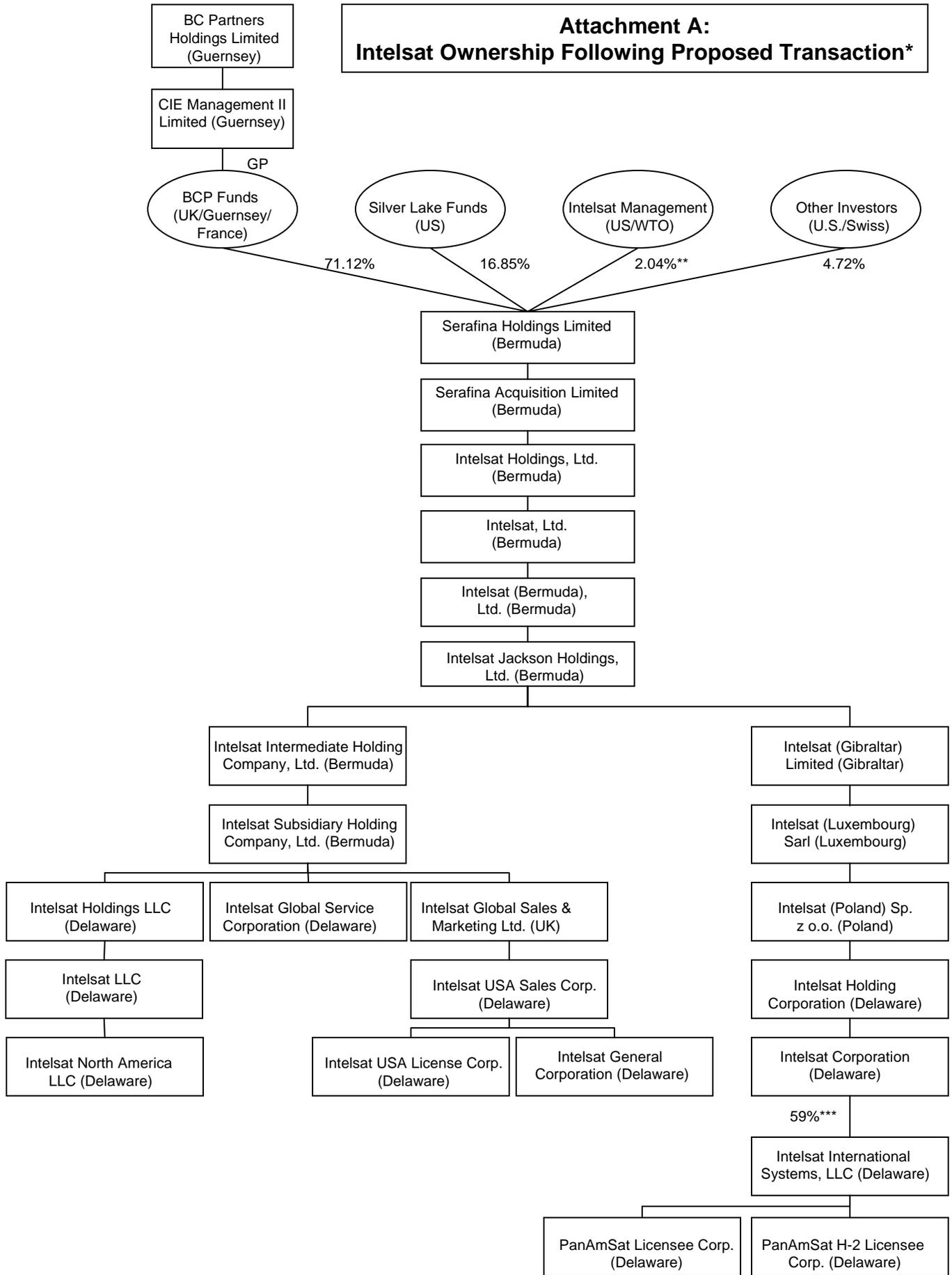
/s/ Brian D. Weimer

Brian D. Weimer
Counsel for Serafina Holdings Limited

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cc: James L. Ball
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Jennifer D. Hindin (counsel for Intelsat Holdings, Ltd.)

**Attachment A:
Intelsat Ownership Following Proposed Transaction***



Notes to Attachment A

- * All subsidiaries are wholly-owned unless otherwise noted.

- ** The stated interest of Intelsat management is based on a minimum equity investment by Intelsat management required by the Share Purchase Agreement and will fluctuate in immaterial amounts depending upon the date of the closing and the continued employment of certain members of management. Individual members of Intelsat's management may elect to reinvest additional amounts in the post-transaction Intelsat and, to the extent they do so, there may be resulting small adjustments in other investors' interests.

- *** Intelsat Corporation owns 59 percent of Intelsat International Systems, LLC. USHI, LLC, a Delaware limited liability company, owns the remaining 41 percent of Intelsat International Systems, LLC. USHI, LLC is wholly owned by PanAmSat International Holdings LLC, also a Delaware limited liability company, which in turn is wholly owned by Intelsat Corporation.