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June 15, 2009

## **BY ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attention: International Bureau

**Re: IB Docket No. 08-232**  
**Applications of Iridium Holdings LLC and GHL Acquisition Corp.**  
**for Consent to Transfer Control of Iridium Carrier Services LLC,**  
**Iridium Satellite LLC and Iridium Constellation LLC**

Dear Ms. Dortch:

At the request of staff of the International Bureau, Iridium Holdings LLC (“Iridium”) and GHL Acquisition Corp. (“GHQ”) provide the following supplemental information with respect to certain responses to questions addressed in their filing of June 2, 2009 (the “Joint Submission”).<sup>1</sup>

A. Supplement to Response to Question 1, Attachment A

- The ownership figures in Attachment A reflect the post-consummation ownership of Iridium and its wholly-owned licensee subsidiaries prior to conversion of the note held by Greenhill Co. Europe Holdings Limited (“Greenhill Europe”).<sup>2</sup>
- “Iridium Employee Holdings LLC” and “Employee Holdings LLC” are separate entities.
- A.B. Krongard is an individual U.S. citizen.

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<sup>1</sup> See Letter from Matthew S. DelNero, Covington & Burling LLP, Counsel for GHL Acquisition Corp. to Marlene H. Dortch, Secretary, FCC, IB Docket No. 08-232 (June 2, 2009).

<sup>2</sup> For additional information concerning the note held by Greenhill Europe and the effect of conversion on the level of indirect foreign ownership of Iridium Carrier Services, please see the response to Question 6 of the Joint Submission.

B. Supplement to Response to Question 1, Attachment D

The country information provided in Attachment D for each creditor of Iridium LLC indicates the creditor's place of business, as determined based upon its place of incorporation. In most instances, Iridium relied upon each creditor's W-9 or W-8ECI filings to determine the place of incorporation; in other instances, Iridium relied upon its knowledge as to the creditor's place of incorporation.

C. Supplement to Response to Question 4

As discussed in footnote 31 to Exhibit E of the parties' Application for Consent to Transfer Control of Iridium Carrier Services LLC, File No. SES-T/C-20081021-01353 (filed Oct. 21, 2008) (the "Application"), certain employees of Greenhill & Co. ("Greenhill") and certain employees' relatives purchased shares of GHQ in the initial public offering ("IPO") of GHQ. These shares are held in brokerage accounts on behalf of their beneficial owners. Based upon Greenhill's knowledge regarding the citizenship of such employees and employees' relatives, the following table provides aggregate data concerning the country of citizenship of the employees of Greenhill and employees' relatives who own shares of GHQ that were issued in the IPO, the number of such shares owned by citizens of each country, and the percentage that such shares represent of the 40,000,000 shares of GHQ that were issued in the IPO.

<b>Country of Citizenship</b>	<b>GHQ IPO Shares</b>	<b>Percentage of All GHQ IPO Shares</b>
United States	810,000	2.03
Canada	20,000	0.05
France	50,000	0.13
Germany	20,000	0.05
Ireland	10,000	0.03
South Africa	10,000	0.03
Sweden	25,000	0.06
United Kingdom	270,000	0.68

D. Supplement to Response to Question 5

As of April 2009, 12,181,052 shares of Greenhill, comprising approximately 43 percent of the outstanding shares of Greenhill, are owned by registered shareholders.<sup>3</sup> Virtually all of these shares are owned by employees of Greenhill, or by trusts, foundations, and other entities established by them for the benefit of family members or for estate planning or similar purposes.<sup>4</sup>

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<sup>3</sup> As of April 2009, Greenhill employees (or entities established by them, *see* *infra*, note 5) own approximately 44 percent of the outstanding shares of Greenhill. Approximately 43 percent of the outstanding shares of Greenhill are held by employees as registered shareholders and approximately 1 percent of the outstanding shares of Greenhill are held in street name on behalf of employees of Greenhill.

<sup>4</sup> 1,408 shares are owned by registered shareholders who do not have an affiliation with Greenhill. Because the citizenship of these shareholders is not directly known by Greenhill, they are classified as "not affiliated with (continued...)"

Based upon Greenhill’s knowledge regarding the citizenship of the registered shareholders, the following table provides aggregate data concerning the country of citizenship of shares owned by registered shareholders, the number of such shares owned by citizens of each country, and the percentage that such shares represent of the 28,128,415 issued and outstanding shares of Greenhill:<sup>5</sup>

<b>Country of Citizenship</b>	<b>Greenhill Shares</b>	<b>Percentage of All Greenhill Shares</b>
United States	8,666,210	30.81
Ireland	138,095	0.49
United Kingdom	3,375,339	12.13
<i>Not affiliated with Greenhill</i>	1,408	0.01

E. Supplement to Response to Question 6

By way of clarification, Fidelia Communications Inc. (“Fidelia”) will not participate in the GHQ/Iridium transaction and accordingly will not become an owner of GHQ—which will be renamed Iridium Communications Inc.—at the closing of the GHQ/Iridium transaction.<sup>6</sup> Fidelia will retain its direct ownership interest of 0.55 percent in Iridium Holdings LLC. Accordingly, the indirect ownership interest of each owner of Iridium Communications Inc. in Iridium Carrier Services will be 99.45 percent of such owner’s direct ownership interest in Iridium Communications Inc.

Please contact the undersigned if you have any questions about this submission.

Respectfully submitted,



Mace Rosenstein  
Matthew S. DelNero

*Counsel for GH Acquisition Corp.*

cc: Jennifer D. Hindin, *Counsel for Iridium Holdings LLC*

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Greenhill” in the chart below. In the report of the Altman Group concerning the ownership of Greenhill, the Altman Group determined the citizenship of these shareholders in accordance with their address of record.

<sup>5</sup> As noted above, certain registered shareholders of Greenhill are trusts, foundations, or other entities established by employees of Greenhill. In the chart concerning Greenhill shares owned by registered shareholders, the citizenship of each such entity is determined by the citizenship of the employee who established the entity.

<sup>6</sup> See Ex. E of the Application at 5, n.6; Joint Submission at 9, n.26.