
ALLAN G. MOSKOWITZ, ESQ.

November 29, 2011

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

Re: Astrium Response to Staff Inquiry
IB Docket No. 11-143

Dear Ms. Dortch:

On behalf of Astrium Holding S.A.S., proposed transferee of Vizada, Inc. and Marlink, Inc., which hold FCC licenses and authorizations, from Chrysaor S.à r.l., proposed transferor, and at the request of the staff of the International Bureau, I am respectfully submitting Astrium's response to the staff's inquiry.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

By 
Allan G. Moskowitz

Cc: Susan O'Connell, International Bureau (by e-mail)
Sumita Mukhoty, International Bureau (by e-mail)
Karis S. Hastings, Esq. (by e-mail)

ASTRIUM RESPONSES TO FCC STAFF QUESTIONS

1. Does the pooling arrangement affect/alter the parties' respective equity interests (e.g., rights to distributions, profits) in EADS?

Response: The pooling arrangement does not affect or alter the parties' respective equity interests in EADS.

2. Does Astrium have more recent information as to the respective equity and voting interests held in EADs by the parties that have pooled their shares (see note 1, Att. 2)?

RESPONSE: Yes, see the distribution of EADS Share Capital as of 9/30/2011 below.

DISTRIBUTION OF EADS SHARE CAPITAL

AS OF
9/30/2011

Shareholders	Number of shares	% of capital	% of voting rights
SOGEADE	183,337,704	22.36%	22.45%
Dasa*	183,337,704	22.36%	22.45%
SEPI	44,690,871	5.44%	5.48%
<i>Sub-total Contractual Partnership</i>	<i>411,366,279</i>	<i>50.16%</i>	<i>50.38%</i>
French State	502,746	0.06%	0.06%
Public	404,658,032	49.34%	49.56%
Own share buy-back	3,614,509	0.44%	-
Total	820,141,566	100.00%	100.00%

3. Which jurisdiction(s) require(s) the reporting of EADS' 5%-or-greater shareholders?
[See Att. 2, pg. 3]

RESPONSE: Dutch Law, EADS NV being a Dutch entity listed on the Amsterdam Stock Exchange. Similar laws in the other jurisdictions where EADS NV is also listed (France, Germany, Spain) do not apply.

4. CORPORATE GOVERNANCE OF LAGARDÈRE

The management of the Company is provided by the Managing Partners under the supervision of the Supervisory Board representing the shareholders.

Lagardère is a French limited partnership with shares (société en commandite par actions - SCA) that has two categories of partners:

- two General Partners (Associés Commandités), who have joint, several and unlimited liability for the company's debts;
- Limited Partners (Associés Commanditaires or shareholders) whose liability, as for shareholders in a société anonyme (form of French limited liability company), as regards the company's losses, is limited to the amount of their contributions. The Limited Partners alone designate the members of the Supervisory Board, the General Partners being unable to participate in the voting. Limited Partners are comparable to stockholders in a corporation.

The two General Partners are:

1. Mr. Arnaud Lagardère

Mr. Arnaud Lagardère was appointed Managing Partner in March 2003 and his appointment was renewed by the Supervisory Board on proposal of the General Partners on 11 March 2009, for a period of six years to run until 11 March 2015. In addition, Mr. Arnaud Lagardère is the Chairman of Lagardère (SAS) and Lagardère Capital & Management (SAS). Mr. Arnaud Lagardère and these two companies held 9.62% of Lagardère SCA's share capital and 15.27% of the voting rights as of September 30, 2011.

2. Arjil Commanditée-Arco is a French corporation located at 121 avenue de Malakoff - 75116 Paris, France.

The representatives of Arjil Commanditée-Arco and their respective nationalities are:

Arnaud Lagardère, Chairman and Chief Executive Officer	France
Philippe Camus, Deputy Chairman and Chief Operating Officer	France
Pierre Leroy, Deputy Chairman and Chief Operating Officer	France
Dominique D'Hinnin, Chief Operating Officer	France
Thierry Funck-Brentano, Chief Operating Officer	France

Because of the two categories of partners, collective decisions require double consultation: that of the shareholders, in general meetings, and that of the General Partners.

The Company is managed by the Managing Partners (Arnaud Lagardère and Arjil Commanditée-Arco) under the supervision of the Supervisory Board which represents

the shareholders. No member of the General Partners or the Managing Partners (who are identical in this case) can be a member of the Supervisory Board. (see below)

General Partners

Amaud Lagardère
The company Arjil
Commanditée - Arco

Statutory Auditors

Ernst & Young et Autres
Mazars

Managing Partners

- Arnaud Lagardère
- The company Arjil Commanditée - Arco
represented by: Amaud Lagardère
Chairman and Chief Executive Officer
Philippe Camus
Deputy Chairman and Chief Operating Officer
Pierre Leroy
Deputy Chairman and Chief Operating Officer
Dominique D'Hinnin
Chief Operating Officer
Thierry Funck-Brentano
Chief Operating Officer

Lagardère SCA's by-laws provide the following shareholders' rights:

- Right of veto over the appointment of the Managing Partners
The Supervisory Board, which represents the shareholders, must give its consent to the appointment of the Managing Partners by the General Partners.
The shareholders have the ultimate bargaining power in case of any disagreements between the General Partners and the Supervisory Board.
- Approval in case of a change of control of Arjil Commanditée-Arco (General and Managing Partner).

The Supervisory Board must give its prior agreement to:

- any sale or issue of shares leading to a change of control of Arjil Commanditée - Arco (except in the case of a valid takeover bid for all the Company's shares);
- any new shareholder in this company.

5. 5% OR MORE SHAREHOLDERS OF LAGARDÈRE

1. Mr. Arnaud Lagardère, personally and via his two companies, Lagardère SAS and Lagardère Capital & Management (LC&M), is the largest permanent shareholder in the Lagardère group with 9.62% of the capital and 15.27% of the rights to vote at meetings. In accordance with the Company's by-laws, all shares which have been registered in the name of LC&M for at least four years carry double voting rights. LC&M's share capital is held by its Chairman, Mr. Arnaud Lagardère, who is also a Managing Partner of Lagardère SCA together with Arjil Commanditée- Arco.
Address: Lagardère Ressources 4, rue de Presbourg 75116 Paris.

2. Qatar Investment Authority("QIA") holds 7.6% of the share capital and 6.22% of the rights to vote at meetings as of December 31, 2010.

Qatar Investment Authority was founded by the State of Qatar in 2005. The Chief Executive and Chairman of the QIA is Sheik Hamad bin Jassem bin Jabr Al Thani. Qatar is a member of the WTO.

Address: Qatar Holding LLC Qtel Tower - West Bay P.O BOX 23224 DOHA QATAR

Based on the information received from Lagardère's Legal and Investor Relations Departments as well as from BNP Paribas Securities Services, which is keeping the shareholder list on behalf of Lagardère SCA, after due inquiry and to the best of our knowledge and belief, more than 81.5% of the voting rights of Lagardère SCA's stock is held by entities and individuals in WTO member countries.

We were further informed by BNP Paribas Securities Services that an additional 11.28% of the share capital and 14.48% of the voting rights are held by institutional custodians, the vast majority of which are located in WTO member countries, on behalf of beneficial owners. Additional information on the residence of these beneficial owners is not available as the custodians did not provide it to BNP Paribas Securities Services.

6. EXISTENCE OF ANY DAIMLER SHAREHOLDER AGREEMENTS

The applicant has confirmed that no person or entity or groups of persons acting together has a controlling interest in Daimler.