



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

July 30, 2012

Jennifer D. Hindin
202.719.4975
jhindin@wileyrein.com

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

Re: **Intelsat License LLC and Intelsat New Dawn Company, Ltd.
Request for Extension of Closing Deadline, IB Docket No. 11-205;
File Nos. SAT-T/C-20111123-00225, SAT-T/C-20111123-00226, SES-
T/C-20111123-01403, and SES-T/C-20111206-01427.**

Dear Ms. Dortch:

Intelsat License LLC and Intelsat New Dawn Company, Ltd. (collectively, the “Intelsat Licensees”), by counsel, respectfully request an additional 180 days—until February 12, 2013—to consummate the transfer of control that the Commission previously approved in the above-referenced proceedings.

On November 23, 2011, the Intelsat Licensees sought authority for the transfer of control of all of the earth station, space station, and wireless licenses and authorizations held by the Intelsat Licensees.¹ Specifically, the Intelsat Licensees proposed to transfer control pursuant to a public offering of newly issued voting shares, subsequent voting share sales by current shareholders, and possible private placements of newly issued voting shares.²

On May 16, 2012, the International Bureau authorized the transfer of control of the earth station and space station licenses held by the Intelsat Licensees.³ The

¹ *Intelsat Application for Transfer of Control*, IB Docket No. 11-205, File Nos. SAT-T/C-20111123-00225, SAT-T/C-20111123-00226, SES-T/C-20111123-01403, SES-T/C-20111206-01427 and 0004961083 (filed Nov. 23, 2011) (“*Intelsat Transfer Application*”).

² *Id.*

³ *See Intelsat Global Holdings, S.A. Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, IB Docket NO. 11-205, Order, 27 FCC Rcd 5226 (rel. May 16, 2012) (“*Intelsat Transfer Application Grant*”). On May 16, 2012, the Wireless Telecommunications Bureau authorized the transfer of control of the wireless authorizations held by the Intelsat Licensees. *See Wireless Telecommunications Bureau, Assignment of License Authorization Applications, Transfer of Control of Licensee Applications, De Facto Transfer Lease Applications and Spectrum Manager Lease Notifications, Designated Entity Reportable Eligibility Event Applications, and Designated Entity Annual Reports Action*, Report No. 7780, File No. 0004961083 (rel. May 23, 2012; effective May 16, 2012). Pursuant to Section 1.948(d) of the Commission’s rules, the deadline for consummating the transfer of control of the

Ms. Marlene H. Dortch, Secretary
July 30, 2012
Page 2

International Bureau specified August 16, 2012 as the deadline for consummating the transactions.⁴

Grant of this request for an extension of time will serve the public interest. The timing for consummation of the approved of the transfer of control is influenced by several variables. As the Intelsat Licensees indicated in the *Intelsat Transfer Application*, “[t]he timing and volume of the Transactions depend upon prospects reflecting industry and company factors and general market conditions.”⁵ Grant of the requested extension will serve the public interest by permitting Intelsat an opportunity to complete the approved transfer of control in a time frame consistent with current business and market considerations.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin

(Continued . . .)

wireless license is 180 days after authorization—November 19, 2012. *See* 47 C.F.R. § 1.948(d). The Intelsat Licensees plan to file a separate request to extend this deadline.

⁴ *Intelsat Transfer Application Grant* at ¶ 16.

⁵ *Intelsat Transfer Application* at 4.