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December 13, 2013

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Oral Ex Parte Presentation –Assessment and Collection of
Regulatory Fees; MD Docket Nos. 13-140, 12-201 & 08-65

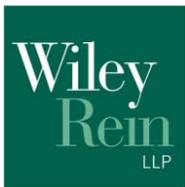
Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on December 11, 2013, Susan Crandall, Associate General Counsel, Intelsat Corporation, and Helen Eisner and the undersigned of Wiley Rein LLP, counsel for Intelsat, met with Roland Helvajian of the Office of Managing Director and Mika Savir of the Enforcement Bureau. Thomas Buckley of the Office of Managing Director and Thomas Sullivan of the International Bureau participated by phone.

In the meeting, Intelsat thanked the Commission for its efforts to reallocate fees to more accurately reflect the Commission's work on behalf of U.S.-licensed space station operators in the Final Rule for the Assessment and Collection of Regulatory Fees for Fiscal Year 2013. The discussion then focused on issues to be addressed in the forthcoming further notice of proposed rulemaking regarding regulatory fees.

Intelsat asked the Commission to consider further reallocation of fees associated with the work of indirect and direct full time employees ("FTEs") to ensure that the costs for these employees are allocated fairly. Specifically, Intelsat supported the reassessment of fees for indirect FTEs that rarely work on behalf of satellite operators, such as employees of the Consumer and Governmental Affairs Bureau.

Intelsat also reiterated its request that the Commission consider collecting regulatory fees from non-U.S. satellite operators with U.S. market access, given the work done by the staff on matters pertaining to non-U.S. satellite operators and the competitive inequities perpetuated by the current fee structure. Finally, Intelsat discussed methods to assess fees on ALSAT-designated earth stations.



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Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel for Intelsat

cc: Roland Helvajian
Mika Savir
Thomas Sullivan
Thomas Buckley