

NON-PUBLIC
FOR INTERNAL USE ONLY

Brian D. Weimer
Writer's Direct Line: 202-469-4904
bweimer@sheppardmullin.com

June 6, 2012

CONFIDENTIAL, NOT FOR PUBLIC INSPECTION

FILED/ACCEPTED

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

JUN - 6 2012

Federal Communications Commission
Office of the Secretary

Attention: Satellite Engineering Branch, International Bureau

Re: GE International Holdings Inc.
Annual Report for GE-23 (Call Sign S2610)

Dear Ms. Dortch:

GE International Holdings Inc. ("GE Satellite"), by undersigned counsel, submits herewith the report required by Section 25.210(1) of the Commission's rules for the GE-23 satellite (the "Annual Report"). All information set forth in the Annual Report is current as of May 31, 2012.

Pursuant to Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), GE Satellite requests confidential treatment of certain portions of the Annual Report. Accordingly, GE Satellite is simultaneously filing both a public (i.e., redacted) version of this Annual Report and a complete (i.e., unredacted) version of the Annual Report. This version of the Annual Report is the Non-Public Version. For the reasons set forth below, GE Satellite respectfully requests that the Commission withhold from public inspection the complete version of the Annual Report and permit members of the public to view only that version of the Annual Report marked "Public Version." In support of this request, GE Satellite states as follows:

1. Identification of the Specific Information for Which Confidential Treatment Is Sought

GE Satellite requests that the Commission afford confidential treatment to Part 2 (unscheduled transponder outage information), Part 3 (transponder utilization), and Part 4 (transponders not available for service or transponders not performing within specifications) of the Annual Report.

2. Identification of the Commission Proceeding In Which the Information Was Submitted or a Description of the Circumstances Giving Rise to the Submission

NON-PUBLIC
FOR INTERNAL USE ONLY

Marlene H. Dortch
June 6, 2012
Page 2

The Annual Report is being submitted in response to the requirements of Section 25.210(1) of the Commission's rules, 47 C.F.R. § 25.210(1).

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged

Parts 2, 3, and 4 of the Annual Report contain information concerning transponder outages, transponder utilization, and transponders not available for service. Given that GE Satellite's business consists of providing capacity on GE-23's satellite transponders, the information contained in Parts 2, 3, and 4 of the Annual Report is by definition commercial information.

4. Explanation of the Degree to Which the Information Concerns a Service That Is Subject To Competition

The Annual Report concerns satellite services provided by GE Satellite. The market for these services is subject to existing and potential competition from numerous satellite operators, both domestic and foreign, including Intelsat and SES, as well as from various terrestrial service providers (e.g., fiber optic companies).

5. Explanation of How Disclosure of the Information Could Result In Substantial Competitive Harm

Information concerning GE-23's transponder outages, transponder utilization, and transponders not available for service constitutes a critical component of GE Satellite's business plans and capabilities for the GE-23 spacecraft. GE Satellite's competitors could use this information to ascertain demand, supply, and pricing for the satellite services GE Satellite provides to its customers in an effort to gain an advantage in their own marketing strategies. Consequently, disclosure of this information to third parties could result in substantial competitive harm to GE Satellite.

6. Identification of Any Measures Taken By the Submitting Party to Prevent Unauthorized Disclosure

The information contained in Parts 2, 3, and 4 of the Annual Report is not normally distributed, circulated, or provided to any party outside of GE Satellite. The company treats this data as sensitive information; thus only specialized personnel within the company have access to it.

Marlene H. Dortch
June 6, 2012
Page 3

7. Identification of Whether the Information Is Available To the Public and the Extent of Any Previous Disclosure of the Information to Third Parties

The information contained in Parts 2, 3, and 4 of the Annual Report is not available to the public and has not been disclosed to third parties other than the FCC.

8. Justification of the Period During Which The Submitting Party Asserts That Material Should Not Be Available For Public Disclosure

GE Satellite maintains that the information contained in Parts 2, 3, and 4 of the Annual Report should remain subject to confidential treatment permanently. Even historical data can be used to track trends or business decisions, and this information could be used by GE Satellite's competitors to the detriment of GE Satellite at any time in the future.

9. Any Other Information That The Party Seeking Confidential Treatment Believes May Be Useful In Assessing Whether Its Request For Confidentiality Should Be Granted

GE Satellite notes that the information contained in Parts 2, 3, and 4 of the Annual Report falls under Exemption 4 of the Freedom of Information Act because this information is (i) commercial or financial in nature; (ii) obtained from a person outside government; and (iii) privileged and confidential. *See* 5 U.S.C. 552(b)(4) and 47 C.F.R. § 0.457(d). Thus, the information should be afforded confidential treatment.

Please contact the undersigned should you have any questions concerning this submission.

Respectfully submitted,



Brian D. Weimer
Counsel for GE International Holdings Inc.

Enclosure

cc: Columbia Operations Center

SheppardMullin

Sheppard Mullin Richter & Hampton LLP
1300 I Street, NW, 11th Floor East
Washington, D.C. 20005-3314
202.218.0000 main
202.218.0020 main fax
www.sheppardmullin.com

Brian D. Weimer
Writer's Direct Line: 202-469-4904
bweimer@sheppardmullin.com

June 6, 2012

PUBLIC VERSION

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

FILED/ACCEPTED

JUN - 6 2012

Federal Communications Commission
Office of the Secretary

Attention: Satellite Engineering Branch, International Bureau

Re: GE International Holdings Inc.
Annual Report for GE-23 (Call Sign S2610)

Dear Ms. Dortch:

GE International Holdings Inc. ("GE Satellite"), by undersigned counsel, submits herewith the report required by Section 25.210(1) of the Commission's rules for the GE-23 satellite (the "Annual Report"). All information set forth in the Annual Report is current as of May 31, 2012.

GE Satellite is requesting confidential treatment of certain portions of the Annual Report. Accordingly, GE Satellite is simultaneously filing both a public (i.e., redacted) version of this Annual Report and a complete (i.e., unredacted) version of the Annual Report. This version of the Annual Report is the Public Version.

Please contact the undersigned should you have any questions concerning this submission.

Respectfully submitted,

2012 Annual Report



Brian D. Weimer
Counsel for GE International Holdings Inc.

Enclosure

cc: Columbia Operations Center

PUBLIC VERSION

**GE INTERNATIONAL HOLDINGS INC.
ANNUAL REPORT FOR GE-23
TO THE
FEDERAL COMMUNICATIONS COMMISSION
(Data Current as of May 31, 2012)**

June 6, 2012

PUBLIC VERSION

**GE INTERNATIONAL HOLDINGS INC.
ANNUAL REPORT FOR GE-23**

**Part 1
Status of Satellite Construction**

The GE-23 satellite was manufactured by Alcatel Space. The GE-23 satellite was launched on December 28, 2005 and has been in continuous operation since it commenced its intended operations at 172° E.L. on February 15, 2006.

PUBLIC VERSION

**GE INTERNATIONAL HOLDINGS INC.
ANNUAL REPORT FOR GE-23**

**Part 2
Non-Scheduled Transponder Outages
For More Than Thirty Minutes**

Business Proprietary Information Deleted

PUBLIC VERSION

**GE INTERNATIONAL HOLDINGS INC.
ANNUAL REPORT FOR GE-23**

**Part 3
Transponder Utilization**

Business Proprietary Information Deleted

**GE INTERNATIONAL HOLDINGS INC.
ANNUAL REPORT FOR GE-23**

Part 4

Transponders Not Available For Service Or Not Performing To Specifications

Business Proprietary Information Deleted