

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Intelsat USA License LLC for  
Discontinuance of Switched Voice and  
Private Line Services

File No. ITC-214-20051031-00443

Pursuant to Section 214 of the Communications Act and Sections 63.505 and 63.62(e) of the Commission's rules, Intelsat USA License LLC ("Intelsat"), by its counsel, hereby seeks to discontinue the common carrier provision of switched voice and private line services authorized pursuant to File No. ITC-214-20051031-00443.<sup>1</sup> As demonstrated below, and in accordance with Section 214, "neither the present nor the future public convenience and necessity will be adversely affected" by Intelsat's proposed discontinuance.<sup>2</sup> Intelsat has had no customers for these services since 2008, and the proliferation of global satellite, submarine cable and terrestrial fiber networks has created a multitude of options for such services. As a result, the proposed discontinuance will have no adverse impact on the public's ability to obtain these services in the relevant service areas. This application should be treated identically to Intelsat's predecessor COMSAT's application filed in 2001 under similar circumstances.<sup>3</sup>

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<sup>1</sup> See 47 U.S.C. § 214; 47 C.F.R. §§ 63.505, 63.62(e). To the extent the Commission believes that Section 63.19(a) applies as well, Intelsat has no customers for the services to be discontinued and thus there are no affected customers to notify in writing.

<sup>2</sup> See 47 U.S.C. § 214(a).

<sup>3</sup> See Section 63.71 Application of COMSAT CORPORATION for Authority Under Section 214 of the Communications Act to Discontinue the Provision of Occasional-Use Television, Occasional-Use IBS and Part-

(a) *The name and address of each applicant:* The name of the applicant is Intelsat USA License LLC. The address of the applicant is 7900 Tysons One Place, McLean, VA, 22102.

(b) *The name, title, and post office address of the officer to whom correspondence concerning the application is to be addressed:* All correspondence regarding this application should be sent to both Susan Crandall, Associate General Counsel at Intelsat, and Carl Frank, Counsel for Intelsat:

Susan Crandall  
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703-559-7848

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Washington, DC 20006  
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202-719-7269

(c) *Nature of proposed discontinuance, reduction, or impairment:* Intelsat proposes to discontinue its authority to provide common carrier switched voice and private line services.

(d) *Identification of community or part of community involved and date on which applicant desires to make proposed discontinuance, reduction or impairment effective, if for a temporary period only, indicate the approximate period for which authorization is desired:* Intelsat proposes to make this discontinuance effective on August 1, 2016. The discontinuance does not involve any community because Intelsat has had no customers for common carrier switched voice or private line services for almost eight years.

(e) *Proposed new tariff listing, if any, and difference, if any, between present charges to the public and charges for the service to be substituted:* Intelsat will withdraw its current tariff and does not propose to substitute any other services for those being discontinued.

(f) *Description of the service area affected including population and general character of business of the community:* The service area consists of international routes between the United States and sixty-three countries.<sup>4</sup>

(g) *Name of any other carrier or carriers providing telephone service to the community:* There are a plethora of other competitive service options. For example, SES and Eutelsat

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(Continued . . .)

Time IBS Services, Memorandum Opinion and Order, File No. ITC-MS-20011101-00550 (filed Nov. 1, 2001); Section 63.19 Application of COMSAT CORPORATION for Authority Under Section 214 of the Communications Act to Discontinue the Provision of Occasional-Use Television, Occasional-Use IBS and Part-Time IBS Services, Memorandum Opinion and Order, 16 FCC Rcd 22396, ¶ 9 (2001) (granting discontinuance application) (“COMSAT Discontinuance Grant”).

<sup>4</sup> See *Comsat Non-Dominance Order*, Appendix A. *Comsat Corporation, Petition Pursuant to Section 10(c) of the Communications Act of 1934, as amended, for Forbearance from Dominant Carrier Regulation and for Reclassification as a Non-Dominant Carrier*, Order and Notice of Proposed Rulemaking, 13 FCC Rcd 14083, Appendix A (1998). Intelsat is regulated as a dominant carrier on these routes. *Lockheed Martin Corp. (Transfer of Comsat Licenses to Intelsat)*, Order and Authorization, 17 FCC Rcd 27732, ¶¶ 21-22 (2002).

operate global satellite systems providing satellite communications services linking the United States to nearly every country in the world. Other satellite competitors include Hispasat, Telesat, ViaSat, Arabsat, Asia Broadcast Satellite, and Yahsat, among others. Moreover, the proliferation of submarine cables and continental and national fiber optic networks has created a myriad of options for global connectivity for all services, including those proposed to be discontinued.

(h) *Statement of the reasons for proposed discontinuance, reduction, or impairment:* Intelsat proposes this discontinuance because there are currently no customers subscribing to or requesting these common carrier services from Intelsat. The discontinuance will alleviate costly and time-consuming administrative burdens on Intelsat and the Commission.

(i) *Statement of the factors showing that neither present nor future public convenience and necessity would be adversely affected by the granting of the application:* Grant of this discontinuance application will not adversely affect the present or future public convenience and necessity because Intelsat currently has no customers for these services, and has not had a single customer for either of these services in almost eight years—since December 31, 2008. In addition, the proliferation of communications options via satellite, submarine cable, and terrestrial fiber networks provides numerous competitive alternatives to obtain such services, as Intelsat’s lack of customers demonstrates. Entities seeking communications in the relevant service areas not only “can find adequate substitute services,” as in the case of Intelsat’s predecessor’s discontinuance,<sup>5</sup> but are already using them in lieu of those offered by Intelsat. As such, the proposed discontinuance would have no adverse impact.

(j) *Description of any previous discontinuance, reduction, or impairment of service to the community affected by the application, which has been made by the applicant during the 12 months preceding filing of application, and statement of any present plans for future discontinuance, reduction, or impairment of service to such community:* Intelsat has not discontinued, reduced, or impaired any other services in the past 12 months and has no present plans to do so beyond this application for discontinuance.

(k) *Description of the service involved, including:*

(1) *Existing telephone service by the applicant available to the community or part thereof involved:* Intelsat proposes to discontinue its common carrier switched voice and private line services.

(2) *Telephone service (available from applicant or others) which would remain in the community or part thereof involved in the event the application is granted:* As discussed above, the community has multiple options for obtaining service through a number of networks, including satellite, submarine cable, continental, and national fiber networks.

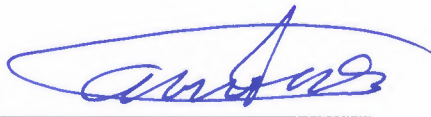
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<sup>5</sup> *COMSAT Discontinuance Grant* ¶ 9 (“Because we find that current COMSAT customers can find adequate substitute services, discontinuance of COMSAT’s occasional-use television, occasional-use IBS and part-time IBS services will not adversely affect the present or future public convenience and necessity.”).

(1) *A statement of the number of toll messages sent-paid and received-collect and the revenues from such traffic in connection with the service proposed to be discontinued, reduced, or impaired for each of the past 6 months; and, if the volume of such traffic handled in the area has decreased during recent years, the reasons therefor:* Intelsat has had no toll messages or revenue in connection with the services proposed to be discontinued in any of the past six months.

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Based on the foregoing, Intelsat respectfully requests that its application for discontinuance be granted. Please contact the undersigned with any questions.



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Carl R. Frank  
Wiley Rein LLP  
*Counsel for Intelsat*

June 28, 2016