

S2804 SAT-A/O-20091223-00151 IB2009008224  
Intelsat North America LLC  
Intelsat 25

Approved by OMB  
3060-0678

Date & Time Filed: Dec 23 2009 5:29:09:750PM  
S2804 SAT-A/O-20091223-00151 IB2009008224  
Intelsat North America LLC

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS  
FCC 312 MAIN FORM  
FOR OFFICIAL USE ONLY

FCC Use Only

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Application to Operate the Intelsat 25 Satellite at 31.5 W.L.

1-8. Legal Name of Applicant

Name:	Intelsat North America LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

*with conditions*

File # SAT-A/O-20091223-00151

Call Sign S2804 Grant Date 4/2/10  
(or other identifier)

Term Dates  
From 4/2/10 To: 7/7/2023

Approved: Boyley & Meadley

*Chief, Satellite Engrs. Br.*



Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

The request of Intelsat North America LLC (Intelsat) for authority to operate a C- and Ku-band space station, Intelsat 25 (Call Sign S2804), at the 31.5° W.L. orbital location, IBFS File No. SAT-A/O-20091223-00151, is GRANTED. Accordingly, Intelsat IS AUTHORIZED to provide Fixed Satellite Service (FSS) at 31.5° W.L. in the 3400-4200 MHz (space-to-Earth), 11450-11700 MHz (space-to-Earth), 12250-12750 MHz (space-to-Earth), 5845-6645 MHz (Earth-to-space), and 13750-14500 MHz bands (Earth-to-space). Intelsat is also authorized to operate telemetry, tracking, and telecommand (TT&C) for Intelsat 25 at the 31.5° W.L. orbital location using the following center frequencies: 6173.7 MHz (telecommand), 6176.3 MHz (telecommand), 3947.5 MHz (telemetry), 3948 MHz (telemetry), 3952 MHz (telemetry), 3952.5 MHz (telemetry), 3950 MHz (tracking), 11198 MHz (tracking), 11452 MHz (tracking), 11701 MHz (tracking), and 12501 MHz (tracking). This authorization is granted in accordance with the technical specifications set forth in Intelsat's application, the Federal Communication Commission's (Commission) rules, and subject to the following conditions:

1. Intelsat shall prepare all necessary information that may be required for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification procedures for this space station, in accordance with the ITU Radio Regulations. Intelsat shall be held responsible for all cost recovery fees associated with these ITU filings. No protection from interference caused by radio stations authorized by other Administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual Administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments with other Administrations. 47 C.F.R. § 25.111(b).
2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
3. While at the 31.5° W.L. orbital location, Intelsat shall maintain the Intelsat 25 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.



File # SAT-A/O-20091223-00151  
Call Sign S2804 Grant Date 4/2/10  
(or other identifier)  
Term Dates  
From 4/2/10 To: 7/7/2023  
Approved: Kathryn Madley  
Chief Satellite Engrs. B.

Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

4. Intelsat's request for waiver of Section 25.211(a) of the Commission's rules, 47 C.F.R. § 25.11(a), IS GRANTED. Section 25.211(a) requires that downlink analog video transmissions in the 3700-4200 MHz band be transmitted only on a center frequency of  $3700+20N$  MHz, where  $N=1$  to 24. The corresponding uplink frequency shall be 2225 MHz higher. Intelsat states that Intelsat 25 utilizes 36 MHz and 72 MHz wide transponders, and that the placement of TV/FM signals within the 72 MHz might result in non-compliance with Section 25.211(a). Because the closest co-frequency satellites to Intelsat 25 are Intelsat 903 and Intelsat 907, Intelsat states that it will be able to internally coordinate Intelsat 25's TV/FM transmissions with Intelsat 903 and Intelsat 907. As a condition of this waiver, Intelsat must accommodate future satellite networks that are compliant with Section 25.211(a). Further, Intelsat must operate Intelsat 25 pursuant to any existing or future coordination agreements for this location.
5. Intelsat's request for waiver of Section 25.210(a)(3) of the Commission's rules, 47 C.F.R. § 25.210 (a)(3), IS GRANTED. Section 25.210(a)(3) requires all FSS space stations used for domestic service in the 3700-4200 MHz and 5925-6425 MHz bands to be capable of switching polarization sense upon ground command. The Commission requires polarity-switching capability for two reasons: 1) to provide U.S.-licensed satellites with the flexibility to operate at different orbital locations, and (2) to mitigate potential interference between adjacent fixed-satellite systems transmitting analog television signals.<sup>1</sup> This waiver grant is based upon a finding that the ability to switch polarization is not currently necessary to protect other satellites at adjacent orbital locations from harmful interference, because the only C-band space stations operating within two degrees of Intelsat's proposed location are operated by Intelsat (Intelsat 801 at 29.5° W.L. and Intelsat 903 at 34.5° W.L.) and because the Intelsat 25 space station operations will be in compliance with existing coordination agreements. As a condition of granting this waiver, Intelsat must accommodate future satellite networks that are compliant with Section 25.210(a)(3). Further, Intelsat must operate Intelsat 25 pursuant to any existing or future coordination agreements for this location.
6. Intelsat's request for waiver of Section 25.202(g) of the Commission's rules, 47 C.F.R. § 25.202(g), IS GRANTED. Section 25.202(g) requires "telemetry, tracking and telecommand (TT&C) functions for U.S. domestic satellites shall be conducted at either or both edges of the allocated band(s). Frequencies, polarization and coding shall be selected to minimize interference into other satellite networks and within their own satellite system." Intelsat requests this waiver for the proposed use of 3630 MHz for telemetry because the 3630 MHz telemetry frequency is not at the edge of the 3600-3700 MHz "extended" C-band. This waiver grant is based upon the following findings:

---

<sup>1</sup> Telesat Canada; Petition for Declaratory Ruling for of Inclusion of ANIK F3 on the Permitted Space Station List, *Order*, 22 FCC Rcd 588 (para. 10) (Int'l Bur., Sat. Div. 2007).

Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

- (a) Intelsat 25 will be operated at 31.5° W.L., which is outside the U.S. domestic satellite arc.
- (b) 3630 MHz is not within the 3700-4200 MHz band allocated for FSS in the United States.

As a condition of granting this waiver, Intelsat must accommodate future space station networks that are compliant with Section 25.202(g). Further, Intelsat must operate Intelsat 25 pursuant to any existing or future coordination agreements for this location.

- 7. Intelsat shall not permit any earth station in the United States and its possessions to operate with the Intelsat 25 space station in the bands 3400-3600 MHz and 5845-5850 MHz.
- 8. Intelsat shall inform its customers and operators using the band 3400-3600 MHz of the potential for interference from U.S. Government operations worldwide.
- 9. Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 3600-3650 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.
- 10. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106 NG185, which states that the 3650-3700 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems.
- 11. In the 5845-5850 MHz band (Earth-to-space), receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations or ITU Radio Regulations.
- 12. Intelsat's use of the 5850-5925 MHz band (Earth-to-space) is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. §2.106, US245, which states that the 5850-5925 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat shall not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.<sup>2</sup>
- 13. Intelsat's use of the 11450-11700 MHz band (Earth-to-space) is subject to footnote

---

<sup>2</sup> For technical information of these radiolocation systems, *see* NTIA Report 83-115, Spectrum Resource Assessment in the 5650-5925 MHz Band, and NTIA Report 00-373, Measured Occupancy of 5850-5925 MHz and Adjacent 5-GHz Spectrum in the United States at <http://www.its.blrdoc.gov/pub/pubs.php>.

Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

14. The operation of the Intelsat 25 space station in the 11450-11700 MHz band (Earth-to-space) is limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).
15. In the 13750-14000 MHz band (Earth-to-space), receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.
16. Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, any earth station in the United States and its possessions communicating with the Intelsat 25 space station in the 13750-14000 MHz band (Earth-to-space) is required to coordinate through National Telecommunications and Information Administration's (NTIA's) Interdepartment Radio Advisory Committee's (IRAC's) Frequency Assignment Subcommittee (FAS) to minimize interference to the National Aeronautics and Space Administration Tracking and Data Relay Satellite System, including manned space flight.
17. Operations of any earth station in the United States and its possessions communicating with the Intelsat 25 space station in the 13750-14000 MHz band (Earth-to-space) shall comply with footnote US356 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356 which specifies a mandatory minimum antenna diameter of 4.5 meters and a non-mandatory minimum and maximum equivalent isotropically radiated powers (e.i.r.p.). Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 25 space station in the 13750-14000 MHz band (Earth-to-space) shall be consistent with footnote 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.
18. Operations of any earth station in the United States and its possessions communicating with the Intelsat 25 space station in the 13770-13780 MHz band (Earth-to-space) shall comply with footnote US357 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US357, which specifies that a required maximum e.i.r.p. density of emissions not exceed 71 dBW in any 6 MHz band for communications with a space station in geostationary-satellite orbit.<sup>3</sup> Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 25 space station in the 13770-

---

<sup>3</sup> Footnote US357 places a restriction on FSS earth station operations in order to protect government operations in the band, including manned space flight. 47 C.F.R. § 2.106, US357.



Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

13780 MHz band (Earth-to-space) shall comply with footnote 5.503 to the ITU Radio Regulations, which specifies a required maximum e.i.r.p. density of emissions (limit is dependent on antenna diameter) for communications with a space station in geostationary-satellite orbit.

19. Operators of earth stations accessing the Intelsat 25 space station in the 13750-14000 MHz band are encouraged to cooperate voluntarily with the National Aeronautics and Space Administration (NASA) in order to facilitate continued operation of NASA's Tropical Rainfall Measuring Mission (TRMM) satellite.<sup>4</sup>
20. Intelsat's operation of the 3400-4200 MHz, 5850-6645 MHz in the C- and extended C-band, and operation of the 11450-11700 MHz, 12500-12750 MHz, and 13750-14500 MHz frequencies in the Ku- and extended Ku-bands at the 31.5° W.L. orbital location is subject to the following conditions:
  - (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
  - (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.
21. The license term for this space station, Call Sign S2804, expires on July 7, 2023, which is fifteen years from the launch date of July 7, 2008.
22. Intelsat is afforded thirty days from the date of this action to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

---

<sup>4</sup> NASA's TRMM satellite system radar in the 13.793-13.805 GHz band remains operational and is a highly valuable and visible United States asset with a broad range of international users. Accordingly, NTIA has requested cooperation from the Commission and non-Federal Government entities in providing assistance in reducing interference with the TRMM radar. Specifically, NTIA requests that FSS earth stations in the 13.793 - 13.805 GHz band located south of 39° N. and east of 110° W. operate with emission levels below -150 dBW/600 kHz at the TRMM space station receiver. Letter from Frederick R. Wentland, Acting Associate Administrator, Office of Spectrum Management, NTIA, to Don Abelson, Chief, International Bureau, FCC (February 28, 2002). Considering the secondary nature of the TRMM operation, NTIA's request is not a condition of this authorization. The Commission, however, urges all operators of earth stations accessing the Intelsat 25 space station in the 13.75 - 14.0 GHz band to cooperate voluntarily with NASA in order to facilitate continued operation of the TRMM satellite.

Attachment to Grant  
Intelsat North America LLC  
IBFS File No. SAT-A/O-20091223-00151  
Call Sign: S2804

23. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

9-16. Name of Contact Representative			
Name:	Jennifer D. Hindin	Phone Number:	202-719-4975
Company:	Wiley Rein LLP	Fax Number:	202-719-7049
Street:	1776 K Street, NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006
Attention:		Relationship:	Legal Counsel

# CLASSIFICATION OF FILING

<p>17. Choose the buttonnext to the classification that applies to thisfiling for both questions a. and b. Choose only one for 17a and only one for 17b.</p> <p>a.</p> <p>(N/A) a1. Earth Station</p> <p><input checked="" type="radio"/> a2. Space Station</p>	<p>b.</p> <p>b1. Application for License of New Station (N/A) b2. Application for Registration of New Domestic Receive-Only Station (N/A) b3. Amendment to a Pending Application (N/A) b4. Modification of License or Registration (N/A) b5. Assignment of License or Registration (N/A) b6. Transfer of Control of License or Registration (N/A) b7. Notification of Minor Modification (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite</p> <p>b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States</p> <p><input checked="" type="radio"/> b10. Replacement Satellite Application – no new frequency bands</p> <p><input checked="" type="radio"/> b11. Replacement Satellite Application – new frequency bands (Not eligible for streamlined processing)</p> <p>b12. Petition for Declaratory Ruling to be Added to the Permitted List</p> <p>(N/A) b13. Other (Please specify)</p>
---	---



17c. Is a fee submitted with this application? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). Governmental Entity      Noncommercial educational licensee <input type="radio"/> Other (please explain):	
17c. Fee Classification    BNY – Space Station (Geostationary)	
18. If this filing is in reference to an existing station, enter: (a) Call sign of station: Not Applicable	
19. If this filing is an amendment to a pending application enter: (a) Date pending application was filed: Not Applicable (b) File number of pending application: Not Applicable	

# TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- ☒ a. Fixed Satellite
- ☐ b. Mobile Satellite
- ☐ c. Radiodetermination Satellite
- ☐ d. Earth Exploration Satellite
- ☐ e. Direct to Home Fixed Satellite
- ☐ f. Digital Audio Radio Service
- ☐ g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- ☒ Common Carrier
- ☐ Non-Common Carrier

22. If earth station applicant, check all that apply.  
Not Applicable

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- ☒ Connected to a Public Switched Network
- ☐ Not connected to a Public Switched Network

N/A

24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).

- ☐ a. C-Band (4/6 GHz)
- ☒ b. Ku-Band (12/14 GHz)
- ☐ c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower:      Frequency Upper: (Please specify additional frequencies in an attachment)

# TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- (N/A) a. Fixed Earth Station  
 (N/A) b. Temporary-Fixed Earth Station  
 (N/A) c. 12/14 GHz VSAT Network  
 (N/A) d. Mobile Earth Station  
 e. Geostationary Space Station.  
 f. Non-Geostationary Space Station  
☒ g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Not Applicable

## PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.) Not Applicable

## ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? IF YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

☒ Yes ☐ No

## ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes	<input type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/>	
31. Is the applicant a corporation organized under the laws of any foreign government?	Yes	No <input checked="" type="radio"/> N/A <input type="radio"/>
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes	No <input type="radio"/> N/A <input type="radio"/>
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="radio"/> Yes	No <input type="radio"/> N/A <input type="radio"/>
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.		

**BASIC QUALIFICATIONS**

<p>35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.</p> <p style="text-align: right;">Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p style="text-align: right;">Technical Exhibit</p>
<p>36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.</p> <p style="text-align: right;">Yes <input type="radio"/> No <input checked="" type="radio"/></p>
<p>37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.</p> <p style="text-align: right;">Yes <input type="radio"/> No <input checked="" type="radio"/></p>
<p>38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances</p> <p style="text-align: right;">Yes <input checked="" type="radio"/> No <input type="radio"/></p>
<p>39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.</p> <p style="text-align: right;">Yes <input type="radio"/> No <input checked="" type="radio"/></p>

<p>40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.</p>	
<p>41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.</p>	<div> <input checked="" type="radio"/> Yes         <input type="radio"/> No       </div>
<p>42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.</p>	<div> <input type="radio"/> Yes         <input checked="" type="radio"/> No       </div>
<p>42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?</p>	

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat North America LLC herein seeks FCC authorization to operate a non-common carrier C- and Ku-band satellite, to be known as Intelsat 25, at the 31.5 W.L. orbital location.

Legal Narrative

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

☒ B

C

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part herof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.



44. Applicant is a (an): (Choose the button next to applicable response.)		
<input type="radio"/> Individual		
<input type="radio"/> Unincorporated Association		
Partnership		
Corporation		
<input type="radio"/> Governmental Entity		
<input checked="" type="radio"/> Other (please specify)      Limited Liability Company		
45. Name of Person Signing	46. Title of Person Signing	
Susan H. Crandall	Asst. General Counsel, IntelSat Corporation	
47. Please supply any need attachments.		
1:	2:	3:
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).		

Completed Schedule S

## **FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 0.25 – 24 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060–0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060–0678.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**