



Federal Communications Commission
Washington, DC 20554

International Bureau

June 5, 2008

Susan H. Crandall, Esq.
Counsel for Intelsat North America LLC
3400 International Drive, NW
Washington, D.C. 20008-3006

Re: Intelsat North America LLC
17/24 GHz Broadcast-Satellite Service
Applications

Dear Ms. Crandall:

This letter refers to Intelsat North America LLC's (Intelsat) applications to provide Broadcast-Satellite Service (BSS) in the 17/24 GHz frequency bands.¹ To assist the Satellite Division in processing these applications, we request additional information or clarification of the following:

1) Intelsat requests a waiver of the requirement to include complete beam connectivity information in Section S10 of Schedule S.² Intelsat also requests a waiver of FCC Form 312 - Schedule S at Section S8 which contains antenna beam diagrams for each beam pattern, and the power flux density levels (pfd) in each beam that results from the emission with the highest power flux density.³ In its requests, Intelsat does not identify the associated rule(s) for which it seeks a waiver. Intelsat must, therefore, amend its applications to include this information. Alternatively, Intelsat may withdraw its requests for waivers and provide, as appropriate, the complete information in Sections S8 and S10 of Schedule S. If Intelsat elects to provide the complete information, we note that for beams operating in the 17.7-17.8 GHz band, the pfd information may be entered into

¹ Intelsat North America LLC, File Nos. SAT-LOA-20050210-00031, SAT-AMD-20080114-00008 (Call Sign: S2662); SAT-LOA-20050210-00030, SAT-AMD-20080114-00009 (Call Sign: S2661); SAT-LOA-20050210-00029, SAT-AMD-20080114-00012 (Call Sign: S2660); SAT-LOA-20050210-00028, SAT-AMD-20080114-00011 (Call Sign: S2659).

² Section S10 of Schedule S requests information concerning beam connectivity to satellite transponders, as required by 47 C.F.R. § 25.114(c)(4)(iii). Intelsat requests these waivers at Exhibit D and in the Technical Description of its amended applications: SAT-AMD-20080114-00008, Technical Description at p.10; SAT-AMD-20080114-00009, Technical Description at p. 11; SAT-AMD-20080114-00011, Technical Description at pp. 10-11; and SAT-AMD-20080114-00012, Technical Description at p 10.

³ Intelsat requests this waiver in its applications at Section IX.C and in its amended applications at Exhibit D. *See* footnote 1. The antenna beam diagram information should be attached to Section S8(f) of Schedule S or alternatively, may be provided as stand-alone attachments.

Sections S8(g)-(l) of Schedule S.⁴ However, information demonstrating compliance with the 17.3-17.7 GHz band regional pfd requirements cannot be entered into Schedule S, but rather must be provided in narrative form in accordance with Section 25.114(d)(5).⁵

2) As discussed above, Intelsat seeks a waiver of our requirement to provide predicted antenna gain contour information for each transmit and receive beam. Accordingly, for the GR uplink and UT downlink beams, Intelsat provides only a single representative beam diagram.⁶ For the UT beam, Intelsat provides pfd calculations for only three representative regions of the United States, *i.e.*, southeast, northeast and west.⁷ Although we are unclear which rules Intelsat seeks waivers for, we remind Intelsat that both Sections 25.114(c)(8) and 25.114(d)(5) require that pfd calculations be provided within each coverage area.⁸ In Exhibit 3L, it appears that Intelsat will provide service on its UT beam to areas outside of the contiguous United States, including Alaska, Hawaii and portions of the Caribbean.⁹ If these areas are not included in Intelsat's calculations, it must provide the pfd calculations for these geographic areas as well.

3) In addition, we note that each of Intelsat's amended applications, at Exhibit 7, provides information for six types of emissions: 24M0G7W, 48M0G7W, 360KG7W, 860KF3D, 250KG7D, and 50K0G7X. In Section 11 of Schedule S, however, Intelsat provides information for only three of the six types of emissions: 24M0G7W, 48M0G7W, and 360KG7W. Section 25.114(c)(4)(ii) of the Commission's rules requires emission designators and allocated bandwidth of emissions to be filed on FCC Form 312-Schedule S.¹⁰ Consequently, the emission designator information for all six carriers should be listed within Section S11 and/or S12 of Schedule S. Although Intelsat includes this information in the narrative sections of its amended applications, we request that Intelsat amend its Schedule S forms to include this information as well.

This request for additional information or clarification is made pursuant to Section 25.111(a) of the Commission's rules.¹¹ Intelsat must file its response with the Commission's Secretary within 15 days of the date of this letter, with a courtesy copy to Kal Krautkramer of my

⁴ 47 C.F.R. §§ 25.114(c)(8) and 25.208(c). Alternatively, this angle-dependent pfd information may be supplied in narrative form. *See* 47 C.F.R. § 25.114(d)(5). Power flux density levels in the 17.7-17.8 GHz band must be in accordance with the requirements of 47 C.F.R. § 25.208(c).

⁵ Power flux density levels in the 17.3-17.7 GHz band must be in accordance with the requirements of 47 C.F.R. § 25.208(w). *See also* 47 C.F.R. §§ 25.114(d)(5).

⁶ These diagrams are provided in Exhibits 3C and 3F of the Technical Description of Intelsat's amended applications.

⁷ This information is provided in Exhibit 8 of the amended applications.

⁸ 47 C.F.R. §§ 25.114(c)(8) and 25.114(d)(5).


⁹ Intelsat North America LLC, File Nos. SAT-AMD-20080114-00008, SAT-AMD-20080114-00009 SAT-AMD-20080114-00012, and SAT-AMD-20080114-00011 at Exhibit 3L, pp 48-50.

¹⁰ 47 C.F.R. § 25.114(c)(4)(ii).

¹¹ 47 C.F.R. § 25.111(a).

staff, otherwise Intelsat's applications may be dismissed. Amendments filed by Intelsat in response to this request will be considered "minor" amendments and not subject to the filing freeze for 17/24 GHz applications.¹² Please contact Kal Krautkramer at (202) 418-1335 if you have any questions.

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

cc: Mr. Jose Albuquerque
Senior Director, Spectrum Engineering, Intelsat Corporation

¹² See Public Notice, International Bureau Establishes Deadline for Amendments to Pending 17/24 GHz BSS Applications, Report No. SPB-223, DA 0704895 (December 5, 2007).