

S2659 SAT-AMD-20080701-00134 IB2008001577
Intelsat North America LLC
GALAXY BSS-4

Approved by OMB
3060-0678

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File Number: SAT-AMD-20080701-00134

S2659 Intelsat @ 122.9° W.L.

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD - MAIN FORM	FCC Use Only
FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

S2659 - Supplemental Minor Amendment to Pending 17/24 GHz BSS Application

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	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

SAT-LOA-20050210-00028
SAT-AMD-20051118-00241
SAT-AMD-20080114-00011
SAT-AMD-20080617-00126



File # SAT-AMD-20080701-0013
Call Sign S2659 Grant Date June 15 2009
(or other identifier)
Term Dates
From To: Conradt
Approved: Chief, Satellite Division

w/conradt

Intelsat North America LLC
File Nos. SAT-LOA-20050210-00028,
SAT-AMD-20051118-00241, SAT-AMD-20080114-00011,
SAT-AMD-20080617-00126, and SAT-AMD-20080701-00134
Call Sign S2659
Attachment – Conditions of Authorization
June 15, 2009

Intelsat North America LLC's (Intelsat's) request for authority to construct, launch, and operate a 17/24 GHz Broadcasting-Satellite Service (BSS) space station, Galaxy BSS-4, at the 122.90° W.L. orbital location, Call Sign S2659, which is offset 0.10° from the 123° W.L. orbital location specified in Appendix F to the *17/24 GHz BSS Report and Order*, FCC 07-76, 22 FCC Rcd 8842 (rel. May 4, 2007) at a reduced power and without full interference protection is GRANTED.¹ Accordingly, Intelsat is authorized to use the 24.75-25.25 GHz frequency band (Earth-to-space) and the 17.3-17.8 GHz frequency band (space-to-Earth), with the 17.7-17.8 GHz (space-to-Earth) frequency band limited to international service only. Intelsat's authorization is subject to the terms, conditions, and technical specifications set forth in its applications, this Attachment, and the Federal Communications Commission's rules.

1. Intelsat may operate its Galaxy BSS-4 space station up to power flux density (PFD) levels that are reduced from those specified in 47 C.F.R. §§ 25.208(c) and 25.208(w) in accordance with the following calculation methodology: For a given location on the surface of the Earth at which the required PFD reduction value needs to be determined, calculate the topocentric angular separation ' ϕ ' of the 119.0° W.L. and 123° W.L. geostationary orbital locations, and the corresponding off-axis gain $G_{CO1}(\phi)$ of the antenna specified in Section 25.224(a)(1) at that angular separation. For the same location on the surface of the Earth, also calculate the topocentric angular separation of the 119° W.L. and 122.90° W.L. geostationary orbital locations, and the gain of the antenna ' $G_{CO2}(\phi)$ ' specified in Section 25.224(a)(1) at that angular separation. Then, perform the subtraction $G_{CO2}(\phi) - G_{CO1}(\phi)$. The result is the required reduction in the PFD from the value specified in the applicable subsection of Section 25.208(c), or in Section 25.208(w).² Intelsat's Galaxy BSS-4 space station

¹ The application was placed on Public Notice as accepted for filing on July 2, 2008. Policy Branch Information, Satellite Space Applications Accepted for Filing, *Public Notice*, Report No. SAT-00535 (rel. July 2, 2008); Policy Branch Information, Satellite Space Applications Accepted for Filing, *Public Notice*, Report No. SAT-00537 (rel. July 11, 2008) (corrections). Comments were filed by Pegasus Development DBS Corporation (Pegasus) and SES Americom Inc. (SES) on August 1, 2008. No petitions to deny were filed against this application. In its comment filed against all pending 17/24 GHz BSS applications, including its own applications, Pegasus sought a "clarification" regarding Commission policies relating to 47 C.F.R. §§ 25.158(c) (prohibition on transfer of place in application queue) and 25.165 (bond requirement). The issues raised by Pegasus are not relevant to the processing of this application and, instead, relate to a request to assign an application to Pegasus from DIRECTV Enterprises, LLC (DIRECTV). IBFS File No. SAT-AMD-20080916-00188. Accordingly, we will not address Pegasus's comment in this grant.

² For the purposes of this calculation, the antenna diameter 'D' should be assumed to be 0.45 meters, which is the minimum-diameter antenna for which 17/24 GHz licensees may claim protection from interference, according to Section 25.224(a), the wavelength ' λ ' should be assumed to be 0.017131 meters, corresponding to a frequency of 17.5 gigahertz, and the value of ' η ' can be assumed to be 0.65, as

transmissions shall meet the reduced PFD limits under all atmospheric conditions. The PFD levels of Galaxy BSS-4's transmissions shall not exceed the maximum pfd levels stated in its application.

2. Intelsat is authorized to operate the on-station command links of the Galaxy BSS-4 space station using one megahertz of assigned bandwidth at each of the uplink center frequencies 24751.5 MHz (right-hand circular polarization) and 25248.5 MHz (left-hand circular polarization); and operate the on-station telemetry links of the Galaxy BSS-4 space station using 350 kilohertz of assigned bandwidth at each of the downlink center frequencies 17303.0 MHz (right-hand circular polarization) and 17303.5 MHz (left-hand circular polarization). Intelsat is also authorized to operate the pointing beacon links of the Galaxy BSS-4 space station using 50 kilohertz of assigned bandwidth at each of the downlink center frequencies 17301.0 MHz (right-hand circular polarization) and 17301.5 MHz (left-hand circular polarization).
3. Intelsat's request for a limited waiver of 47 C.F.R. § 25.202(g) for launch and early orbit (LEOP) operations is GRANTED. Section 25.202(g) limits space station operators to telemetry, tracking, and command (TT&C) links in the same frequency bands as their primary service operations.³ The purpose of this rule is to simplify the coordination process among space stations at adjacent orbit locations, to provide an incentive for a space station operator to maximize the efficiency of its system's TT&C operations and to minimize the constraints placed on other space station operations. We find that Intelsat has demonstrated good cause for a waiver based on: 1) the present lack of 17/24 GHz TT&C facilities around the world; 2) the limited duration of its LEOP operations; and 3) its ability to coordinate C or Ku-band LEOP operations. Accordingly, Intelsat is authorized to use the center frequencies 5925.5 MHz (vertical polarization) and 6424.5 MHz (horizontal polarization) for LEOP global telecommand transmissions (Earth-to-space), with one megahertz of assigned bandwidth at each center frequency. Intelsat is also authorized to use the center frequencies 4197.0 MHz (vertical polarization) and 4198.5 MHz (vertical polarization) for LEOP global telemetry transmissions (space-to-Earth), with 350 kilohertz of assigned bandwidth at each center frequency. As a condition of this waiver, Intelsat shall coordinate its LEOP operations with all potentially-affected operators of other authorized radiocommunication systems. In the absence of a coordination agreement regarding such operations, Intelsat's operations shall be on a non-harmful interference basis *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radiocommunication system. Further, Intelsat must terminate operations immediately upon notification of harmful interference to a lawfully operating radiocommunication system.
4. Intelsat's request for a waiver of 47 C.F.R. § 25.202(g) to use C-band frequencies for on-station TT&C is DENIED. Intelsat initially requested authority to operate

stated in Section 25.224. Intelsat North America LLC, *Order and Authorization*, DA 09-1132 (rel. May 26, 2009) (*Intelsat Order*).

³ 47 C.F.R. § 25.202(g).

its BSS space station at the 121° W.L. orbital location, and requested the waiver based on its authority to use C-band frequencies at this location. In amending its application, Intelsat clarified that its on-orbit TT&C would be limited to emergency operations, however, Intelsat failed to revise its waiver to include a demonstration relevant to the 122.90° orbital location. In addition, to be effective for emergency use, frequencies must be set aside for use at any time for the life of the space station, effectively precluding or conflicting with the use of spectrum by other operators on a long-term basis. We find that Intelsat has failed to show good cause justifying a waiver of Section 25.202(g) for emergency on-station TT&C.

5. Intelsat shall maintain its 17/24 GHz BSS space station with an east-west longitudinal station-keeping tolerance of ± 0.05 of the assigned 122.90° W.L. orbital location.
6. Intelsat is reminded to take into consideration the geographic service requirements of Section 25.225 of the Commission's rules when designing its space station system. 47 C.F.R. § 25.225.
7. Intelsat's authorization to construct, launch, and operate its Galaxy BSS-4 space station at the 122.90° W.L. orbital location will be null and void with no further action on the Commission's part if the space station is not constructed, launched, and placed into operation in accordance with the technical parameters, terms and conditions of this authorization by these specified time periods following the date of authorization:
 - a. Execute a binding contract for construction within one year (June 15, 2010)
 - b. Complete the Critical Design Review of the space station within two years (June 15, 2011)
 - c. Commence Construction of the space station within three years (June 15, 2012)
 - d. Launch and begin operations on the space station within five years (June 15, 2014)
 - e. Intelsat must file a bond with the Commission in the amount of \$3 million, pursuant to the procedures set forth in 47 C.F.R. § 25.165, within 30 days of the grant of this authorization.
8. The license term for Intelsat's 17/24 GHz BSS space station (Call Sign S2659) is fifteen years, the term for non-broadcast 17/24 GHz BSS space station licensees. The license terms begins to run on the date that Intelsat certifies to the Commission that the space station has been successfully placed into orbit and its operation fully conforms to the terms and conditions of this authorization. 47 C.F.R. § 25.121(a). Intelsat shall file this certification with the Chief, Satellite Division, International Bureau, within ten business days of the space station being put into operation.
9. On June 30th of each year, Intelsat must file a report with the International Bureau and the Commission's Columbia Operations Center in Columbia, Maryland, containing the information current as of May 31st of that year, pursuant to Section 25.210(l) of the Commission's rules. 47 C.F.R. § 25.210(l).

10. 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 of other Administrations.⁴
11. This authorization and all conditions contained herein are subject to the final outcome of the Commission's rulemaking in IB Docket No. 06-123 and any requirements subsequently adopted therein.
12. Intelsat has thirty days from the date of release of this authorization to decline the authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
13. Intelsat's request for a partial waiver of 47 C.F.R. § 25.114(d)(3), which requires the applicant to submit predicted space station antenna gain contour(s) for each transmit and receive antenna beam, is GRANTED. The main purpose of the antenna gain contour diagrams is to allow evaluation of the potential for harmful interference with other operators and services in the frequency band. It also facilitates the applicant's preparation of information that may be required for submission to the International Telecommunication Union (ITU) to initiate and complete coordination procedures.⁵ Intelsat complied with the rule for all beams except its 24 gateway receive (GR) and 24 ubiquitous transmit (UT) spot beams.⁶ For each of the GR and UT beams, Intelsat provided the antenna gain contour information in .pdf format, instead of the required .gxt format, with one exception.⁷ Intelsat maintains that providing the information in .gxt format for each of the 48 beams in Schedule S would pose an undue hardship.⁸ While

⁴ In its comments, SES requests that certain conditions relating to ITU procedures be included in each 17/24 GHz BSS authorization. Most of the conditions sought by SES are included in this condition, which is a standard condition on space station authorizations. SES, however, also seeks to impose a customer notification requirement. We see no reason to impose such a condition on this authorization at this time. *See* 47 C.F.R. 25.111(b), and *Intelsat Order*, at para. 19.

⁵ The .gxt format is compatible with the ITU's Radiocommunication Bureau's Graphical Interference Management (GIMS) software used to perform interference and pfd analyses using GIMS. A description of the GIMS software package can be found on the Internet at <http://www.itu.int/ITU-R/software/space/gims/index.html> (last visited April 17, 2009).

⁶ Intelsat North America LLC, File No. SAT-AMD-200800701-00134, Exhibit A, at 1

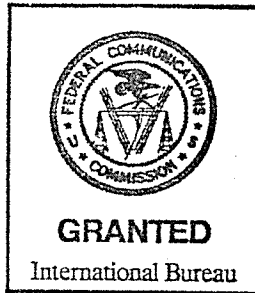
⁷ Intelsat did file one representative GR and UT beam in the required .gxt format.

⁸ Intelsat North America LLC, File No. SAT-AMD-200800701-00134, Exhibit A, at 2.

Intelsat's .pdf format submission was not in compliance with the rule, in this limited instance, we were able to complete our technical review of the antenna gain contour information and determine that the Galaxy BSS-4 space station meets the Commission's technical requirements. Nonetheless, obtaining the antenna beam pattern information in the .gxt file format facilitates the space station ITU coordination process. Consequently, as a condition of granting this waiver, any antenna beam diagrams submitted by Intelsat for purposes of its ITU submissions for this space station must be provided in .gxt format.

14. Intelsat's request for waivers of 47 C.F.R. §§ 25.114(c)(4)(i), 25.114(c)(4)(iii), 25.114(c)(8), and 25.114(d)(5), to the extent the rules request technical information in a particular format DISMISSED as moot.⁹ Our review of the application shows that no waivers are necessary because Intelsat submitted the information in the format required by our rules.¹⁰
15. This grant is issued pursuant to Section 0.261 of the Commission's rule on delegated authority, 47 C.F.R. § 0.261, and is effective upon release. 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 this order.

SAT-LOA-20050210-00028
 SAT-AMD-20051118-00241
 SAT-AMD-20080114-00011
 SAT-AMD-20080617-00126
 SAT-AMD-20080701-00134



with conditions

File # _____
 Call Sign S2659 Grant Date June 15, 2009
 (or other identifier) _____
 Term Dates _____
 From _____ To: condition 8
 Approved: [Signature]

Chief, Satellite Division
 Robert B. Nelson

⁹ Intelsat North America LLC, File Nos. SAT-AMD-20080617-00126, Exhibit A, and SAT-AMD-20080701-00134, Exhibit A.

¹⁰ Intelsat's applications included the information required under the rules. See Intelsat North America LLC, File Nos. SAT-AMD-20080114-00011, Exhibit 8; SAT-AMD-20080617-00126, Exhibit A; and SAT-AMD-20080701-00134, Sections S9 and S10 of Schedule S.

9-16. Name of Contact Representative

Name: Susan H. Crandall **Phone Number:** 202-944-7848
Company: Intelsat Corporation **Fax Number:** 202-944-7870
Street: 3400 International Drive, N.W. **E-Mail:** susan.crandall@intelsat.com
City: Washington **State:** DC
Country: USA **Zipcode:** 20008-3006
Attention: Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
- (N/A) b2. Application for Registration of New Domestic Receive-Only Station
- b3. Amendment to a Pending Application
- b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- b7. Notification of Minor Modification
- (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- (N/A) b10. Other (Please specify)
- (N/A) b11. Application for Earth Station to Access a Non-U.S. satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States
- (N/A) b12. Application for Database Entry
- b13. Amendment to a Pending Database Entry Application
- b14. Modification of Database Entry

<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). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):</p>	
<p>17d. Fee Classification CWY – Space Station Amendment (Geostationary)</p>	
<p>18. If this filing is in reference to an existing station, enter: (a) Call sign of station: S2659</p>	<p>19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number: (a) Date pending application was filed: 02/10/2005 (b) File number: SATLOA2005021000028</p>

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) 17/24 GHz BSS

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.

Using U.S. licensed satellites
 Using Non-U.S. licensed satellites

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: 17300 Frequency Upper: 25500 (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.

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

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive
- Transmit-Only
- Receive-Only
- N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a --- authorization to add new emission designator and related service
- b --- authorization to change emission designator and related service
- c --- authorization to increase EIRP and EIRP density
- d --- authorization to replace antenna
- e --- authorization to add antenna
- f --- authorization to relocate fixed station
- g --- authorization to change frequency(ies)
- h --- authorization to add frequency
- i --- authorization to add Points of Communication (satellites & countries)
- j --- authorization to change Points of Communication (satellites & countries)
- k --- authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l --- authorization to change orbit location
- m --- authorization to perform fleet management
- n --- authorization to extend milestones
- o --- Other (Please specify)

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?

Yes No

30. Is the applicant an alien or the representative of an alien?

Yes No N/A

31. Is the applicant a corporation organized under the laws of any foreign government?

Yes No N/A

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?

Yes No N/A

<p>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?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>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.</p>	

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><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Exhibit A</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><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Attachments 1 and 2</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;"> <input type="radio"/> Yes <input checked="" type="radio"/> No </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;"> <input type="radio"/> Yes <input checked="" type="radio"/> No </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;"> <input type="radio"/> Yes <input checked="" type="radio"/> No </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 &quot;party to the application&quot;; for these purposes.</p>	<p style="text-align: right;">Yes <input checked="" type="radio"/> No <input type="radio"/></p>
<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>	<p style="text-align: right;">Yes <input type="radio"/> No <input checked="" type="radio"/></p>
<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>	
<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.)</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Supplemental response to the International Bureau's June 5, 2008 letter requesting additional information and/or clarification. Other than as noted in this minor amendment, the information in Intelsat's pending application remains unchanged and is incorporated by reference.</p> </div>	

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

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.

C

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 hereof 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.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Susan H. Crandall



46. Title of Person Signing
Assistant General Counsel, Intelsat Corporation

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).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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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.