

October 9, 2012

VIA IBFS



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

Re: Application for Authority to Launch and Operate Intelsat 27, a Replacement Satellite With New Frequencies, at 304.5° E.L.; File Nos. SAT-LOA-20110610-00105 and SAT-AMD-20111111-00215; Call Sign S2827

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) hereby provides clarification and supplemental information in connection with its pending application to launch a satellite, to be known as Intelsat 27. The satellite carries a UHF station, and, as indicated in an amendment filed on November 11, 2011, and a supplement filed September 21, 2012,¹ Intelsat in its current application is not seeking authority from the Federal Communications Commission (“FCC”) to operate the UHF station. Intelsat acknowledges that construction and launch of the satellite without obtaining operational authority for the UHF station is at its own risk.

Intelsat expects that the United States will register the satellite under the Convention on Registration of Objects Launched into Outer Space, and, Intelsat recognizes that, pursuant to Article VIII of the Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space, including the moon and Other Celestial Bodies, the United States shall retain jurisdiction and control over the object. Intelsat further recognizes that the FCC, pursuant to its licensing procedures² and Article 18 of the International Telecommunication

¹ Intelsat subsequently withdrew the supplement filed September 21, 2012. Letter from Jennifer D. Hindin, Counsel to Intelsat License LLC to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-LOA-20110610-00105 and SAT-AMD-20111111-00215 (dated Oct. 4, 2012).

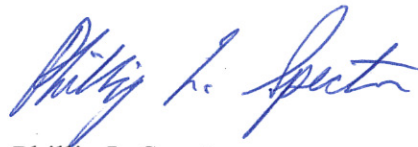
² 47 C.F.R. § 25.113(g).

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Union Radio Regulations,³ therefore will consider the UHF payload in its licensing decision, and is a licensing Administration with respect to all aspects of Intelsat 27 operations. The discussion in the September 21 supplement of the Italian Administration's role as a licensing Administration for the Intelsat 27 UHF payload was not intended to imply any view concerning the jurisdiction and control afforded the United States or the licensing role of the FCC. Intelsat recognizes that any operation of the UHF payload will require prior consent and/or authorization by the FCC, in exercise of its licensing authority. As the UHF band is limited to military operations in the United States National Table of Frequency Allocations,⁴ Intelsat also acknowledges that any prior consent and/or authorization by the FCC will require NTIA and DoD concurrence.

Therefore, Intelsat understands and accepts that any license the FCC issues in the near term for the launch of the Intelsat 27 satellite may include a condition requiring that any operations in the 243.52-268.16 MHz and 292.835-317.33 MHz frequency bands will require the filing of an application and affirmative authorization and/or consent of the FCC, in coordination with NTIA and DoD.

Respectfully Submitted,



Phillip L. Spector
Executive Vice President, Business
Development, & General Counsel

cc (via email): Mr. Robert Nelson, FCC
Karl Kensinger, Esq., FCC
Mr. Edward Davison, NTIA
Susan Crandall, Esq., Intelsat
Jennifer Hindin, Esq., Wiley Rein

³ “No transmitting station may be established or operated by a private person or by any enterprise without a license issued ... by or on behalf of the government of the country to which the station in question is subject.”

⁴ 47 C.F.R. § 2.106, footnote G100 (“The bands 235–322 MHz and 335.4–399.9 MHz are also allocated on a primary basis to the mobile-satellite service, limited to military operations.”).