

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

In the Matter of

Intelsat License LLC

Amendment to Application for  
Modification of Authority for  
Intelsat 8 (S2460)

File Nos. SAT-AMD-2012\_\_\_\_\_  
SAT-MOD-20120619-00100

**Amendment**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.116 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,<sup>1</sup> hereby amends the above captioned modification application seeking authority to relocate Intelsat 8 (Call Sign S2460) to, and to operate the satellite at, 169.10° E.L. With this amendment, Intelsat seeks to change the requested orbital location from 169.10° E.L. to 169.0° E.L. and to expand the requested frequency bands to include the 13997-14000 MHz frequencies in order to clarify that Intelsat seeks authority to operate an Intelsat 8 uplink command frequency at 13998.0 MHz.

In support of this request, Intelsat attaches hereto a Schedule S (showing the requested new orbital location) and an amended Engineering Statement (updating technical information to reflect the new orbital location and expanded request for frequencies). All other information provided in the pending modification application remains unchanged and is incorporated herein by reference.<sup>2</sup> In accordance with the requirements of Section 25.116(e) of the Commission’s rules, 47 C.F.R. § 25.116(e), this amendment is being filed electronically as an attachment to FCC Form 312.

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<sup>1</sup> 47 C.F.R. § 25.116.

<sup>2</sup> See *Policy Branch Information*, Satellite Space Applications Accepted for Filing, Report No. SAT-00883, File No. SAT-MOD-20120619-00100 (Jul. 20, 2012).

## **I. REQUEST TO CHANGE ORBITAL LOCATION TO 169.0° E.L.**

Intelsat currently has a pending modification application to operate Intelsat 8 at the 169.10° E.L. orbital location.<sup>3</sup> Intelsat requests amendment of this application to operate Intelsat 8 at 169.0° E.L.

The proposed change to Intelsat's deployment plan will serve the public interest. As Intelsat explained in the pending modification application, Intelsat 8 will replace the Intelsat 5 satellite (Call Sign S2704), which is currently operating at 169.0° E.L.<sup>4</sup> Location of the Intelsat 8 satellite at 169.0° E.L. will facilitate the most effective traffic transfer for customers currently operating on the Intelsat 5 satellite. Co-location of the satellites in the same station-keeping box will provide antenna pointing convenience and ensure continuity of service for current customers.

Moreover, Intelsat's proposed amendment will not change the nominal orbital location of the Intelsat 8 satellite. Intelsat will operate Intelsat 8 at 169.0° E.L. consistent with international coordination agreements and thus the requested amendment will not adversely affect any party. Accordingly, grant of Intelsat's request to relocate Intelsat 8 to 169.0° E.L. will serve the public interest.

## **II. CLARIFICATION OF UPLINK COMMAND FREQUENCY**

The pending modification application requests authority to operate an Intelsat 8 uplink TT&C frequency at 13998.0 MHz. More specifically, on page 2 of the legal narrative, Intelsat specifically identifies Intelsat 8's use of the 13998.0 MHz uplink for TT&C. In addition, Exhibit

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<sup>3</sup> *Id.*

<sup>4</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00561, DA 08-2346, File No. SAT-MOD-20080725-00150 (Oct. 24, 2008) (Public Notice). Following traffic transfer to Intelsat 8, Intelsat 5 will be redeployed to a different orbital location.

1b on page 13 of the Engineering Statement included this frequency in the list of Frequency Assignments. The 13998.0 MHz band, however, was not included in the chart of communications frequencies on page 3, or in the frequency bands listed on page 1 of the Engineering Statement. To eliminate any inconsistency or potential confusion, Intelsat herein seeks to expand the requested frequency bands to include the 13997-14000 MHz frequencies in order to clarify that it seeks authority to operate a command link at 13998.0 MHz on the Intelsat 8 satellite.

### **III. CONCLUSION**

Based on the foregoing, Intelsat respectfully requests that the Commission grant this amendment application.

Respectfully submitted,

/s/ Susan H. Crandall

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