

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Amendment to Application for
Modification of Authority for
Intelsat 702 (S2388)

File Nos. SAT-AMD-2013_____
SAT-MOD-20121001-00163

**AMENDMENT TO PENDING APPLICATION FOR MODIFICATION OF
AUTHORITY FOR INTELSAT 702**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.116 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby amends the above captioned modification application seeking authority to relocate Intelsat 702 (Call Sign S2388) to, and to operate the satellite at, 33.0° E.L. With this amendment, Intelsat seeks to change the requested orbital location from 33.0° E.L. to 32.9° E.L. to ensure safe station-keeping of Intelsat 702 with neighboring Eutelsat space stations.

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.² In accordance with the requirements of Section 25.116(e) of the Commission’s

¹ 47 C.F.R. § 25.116.

² See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00910, File No. SAT-MOD-20121001-00163 (Nov. 9, 2012) (Public Notice).

rules, 47 C.F.R. § 25.116(e), this amendment is being filed electronically as an attachment to FCC Form 312.

I. REQUEST TO CHANGE THE INTELSAT 702 ORBITAL LOCATION TO 32.9° E.L.

Intelsat has a pending modification application to operate the Intelsat 702 satellite at the 33.0° E.L. orbital location.³ Intelsat requests amendment of this application to operate Intelsat 702 at the 32.9° E.L. orbital location. Intelsat is currently operating at 32.9° E.L. pursuant to special temporary authority.⁴ At 32.9° E.L., Intelsat 702 is collocated with Intelsat 28 (f/k/a Intelsat New Dawn), which operates at 32.8° E.L.⁵

As Intelsat explained in the pending modification application, Intelsat seeks permanent authority to relocate Intelsat 702 in order to provide C- and Ku-band capacity in Europe, Africa, and Asia. At the 32.9° E.L. location, Intelsat will continue to operate Intelsat 702 in the 5925-6425 MHz, 3700-4200 MHz, 14000-14500 MHz, 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz frequency bands and will continue to provide TT&C using the 6173.7 MHz, 6176.3 MHz (LHCP), 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (RHCP) frequencies.

³ *Id.*

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00993, File No. SAT-STA-20140123-00007 (Jan. 31, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00991, File No. SAT-STA-20131219-00147 (Jan. 10, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00977, File No. SAT-STA-20131125-00139 (Dec. 6, 2013) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00977, File No. SAT-STA-20131023-00124 (Nov. 1, 2013) (Public Notice).

⁵ *Policy Branch Information; Actions Taken*, Report No. SAT-00769, File No. SAT-MOD-20101029-00228 (Apr. 1, 2011) (Public Notice).

II. GRANT OF THIS APPLICATION, AS AMENDED, WILL SERVE THE PUBLIC INTEREST

The proposed change will serve the public interest. The permanent redeployment of Intelsat 702 to the 32.9° E.L. orbital location will ensure safe station-keeping of Intelsat 702 with the neighboring Eutelsat 33A satellite and a satellite that Eutelsat recently deployed to the nominal 33.0° E.L. orbital location. Intelsat has reached a station-keeping agreement with Eutelsat with respect to the nominal 33.0° E.L.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 702 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 702 at 32.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 32.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat's proposed amendment will not change the nominal orbital location of the Intelsat 702 satellite, and will not impact Intelsat 702's customers or adversely affect any party. Accordingly, grant of Intelsat's request to relocate Intelsat 702 to 32.9° E.L. will serve the public interest.

III. CONCLUSION

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

Respectfully submitted,

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