

S2913 SAT-AMD-20140718-00087 IB2014001479  
Intelsat License LLC  
INTELSAT 29E



File # SAT-AMD-20140718-00087  
Call Sign S2913 Grant Date 05/21/15  
(or other identifier)  
From see conditions Term Dates see conditions To: conditions  
Approved: Stephen J. Dwall

See also  
SAT-LOA-20130722-00097

Approved by OMB  
3060-0678

Date & Time Filed: Jul 18 2014 2:54:52:646PM  
File Number: SAT-AMD-20140718-00087

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:  
Amendment to Intelsat 29e

1-8. Legal Name of Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-7898
<b>Street:</b>	c/o Intelsat Corporation 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H Crandall		

**Attachment to Grant**  
**IBFS File Nos. SAT-LOA-20130722-00097; SAT-AMD-20140718-00087**  
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The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-LOA-20130722-00097, as amended by IBFS File No. SAT-AMD-20140718-00087, for authority to construct, launch, and operate a geostationary orbit space station, to be known as Intelsat 29e (Call Sign S2913) at the 50.0° W.L. orbital location, is GRANTED.<sup>1</sup> Intelsat is authorized to operate Intelsat 29e at the 50.0° W.L. orbital location to provide Fixed-Satellite Services (FSS) in the following frequency bands:<sup>2</sup>

Space-to-Earth	Earth-to-Space
3700-4200 MHz	5850-5925 MHz
10.7-10.95 GHz	5925-6425 MHz
10.95-11.2 GHz	6425-6725 MHz
11.2-11.45 GHz	12.75-13.25 GHz
11.45-11.7 GHz	13.75-14.0 GHz
11.7-11.95 GHz	14.0-14.5 GHz
11.95-12.2 GHz	17.3-17.55 GHz
12.2-12.5 GHz	29.5-30.0 GHz
19.7-20.2 GHz	

In addition, Intelsat is authorized to conduct Telemetry, Tracking, and Command (TT&C) operations using the following center frequencies: 3701.25 MHz, 3701.75 MHz, 3702.25 MHz, or 3702.75 MHz (space-to-Earth); and 5850.5 MHz, 5853 MHz, 6422 MHz, or 6424.5 MHz (Earth-to-space). Operations under this authorization must be in accordance with the terms, conditions, and technical specifications set

<sup>1</sup> The application was placed on Public Notice as accepted for filing on September 12, 2014. *See Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT-01039 (IBFS File No. SAT-LOA-20130722-00097, as amended by SAT-AMD-20140718-00087). Comments were filed by New Skies Satellites B.V. (New Skies). *See* Comments of New Skies Satellites B.V., submitted by Daniel C.H. Mah, Regulatory Counsel, New Skies (dated Oct. 10, 2014). *See also* Response of Intelsat License LLC, submitted by Susan H. Crandall, Associated General Counsel, Intelsat Corporation (dated Oct. 29, 2014); Reply of New Skies Satellites B.V., submitted by Daniel C.H. Mah, Regulatory Counsel, New Skies (dated Nov. 10, 2014).

<sup>2</sup> As described in the application as amended, Intelsat 29e will provide coverage of North America in the 5850-6725 MHz (Earth-to-space) frequency band, as well as coverage of South America in the following C-band frequencies: 3700-4200 MHz (space-to-Earth), 5850-5925 MHz (Earth-to-space), 5925-6425 MHz (Earth-to-space), 6425-6675 MHz (Earth-to-space), and 6675-6725 MHz (Earth-to-space). Intelsat 29e will provide coverage of North America, Central America, South America, Europe, and the North Atlantic Ocean region in the following Ku-band frequencies: 10.95-11.2 GHz (space-to-Earth), 11.45-12.2 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space). In addition, Intelsat 29e will provide coverage of North America only in the 13.75-14.0 GHz (Earth-to-space) frequency band and coverage of North and South America in the following Ku-band frequencies: 10.7-10.95 GHz (space-to-Earth), 11.2-11.45 GHz (space-to-Earth), 12.2-12.5 (space-to-Earth), and 12.75-13.25 GHz (Earth-to-space). Intelsat 29e will provide coverage to South America in the 17.3-17.55 GHz (Earth-to-space) frequency band and will provide global coverage in the following Ka-band frequencies: 19.7-20.2 GHz (space-to-Earth) and 29.5-30.0 GHz (Earth-to-space). Engineering Statement, IBFS File No. SAT-LOA-20130722-00097, at 1.

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forth in Intelsat's application and the Federal Communications Commission's rules, and are subject to the following conditions:

1. Intelsat must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat will be held responsible for all cost-recovery fees associated with 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, coordination agreements are successfully completed. 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. *See* 47 C.F.R. § 25.111(b).

2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

3. Intelsat must operate Intelsat 29e at the 50.0° W.L. orbital location in compliance with all existing or future coordination agreements for this location.

4. Intelsat must maintain the Intelsat 29e space station within an east/west longitudinal station-keeping tolerance of  $\pm 0.05$  degrees of the 50.0° W.L. orbital location.

5. Intelsat's operations of Intelsat 29e at the 50.0° W.L. orbital location in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-11.95 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space) frequency bands are subject to the following additional conditions:

- a. Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
- b. No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.

6. The operation of Intelsat 29e and associated earth stations must comport with: (i) the applicable uplink limits in Sections 25.138, 25.211, 25.218, 25.221, 25.222, 25.226, and/or 25.227 of the Commission's rules in the 5850-5925 MHz, 5925-6425 MHz, 6425-6725 MHz, 13.75-14.0 GHz, 14.0-14.5 GHz, and 29.5-30.0 GHz frequency bands; (ii) the applicable downlink limits in Sections 25.138 and/or 25.212 of the Commission's rules in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-11.95 GHz (in ITU Region 2), 11.95-12.2 GHz (in ITU Region 2), 12.2-12.5 GHz (in ITU Regions 1 and 3), and 19.7-20.2 GHz frequency bands. These limits cannot be exceeded unless Intelsat coordinates any non-conforming operation with the operations of U.S.-licensed GSO space stations within 6 degrees of 50.0° W.L. Non-conforming operation must also be coordinated with respect to those operations of non-U.S.-licensed space stations within 6 degrees of 50.0° W.L. involving approved communications with U.S.-licensed earth stations.

7. The FSS operations of Intelsat 29e and associated earth stations must comport with: (i) the parameters of the Appendix 30B satellite network USASAT-101B filed with the ITU for operation in the 10.7-10.95 GHz (space-to-Earth), 11.20-11.45 GHz (space-to-Earth), and 12.75-13.25 GHz (Earth-to-space) frequency bands and any additional conditions resulting from the coordination of this network; and (ii) the parameters of the Appendix 30/30A satellite network USABSS-39 filed with the ITU for operation

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in the 12.2-12.5 GHz (space-to-Earth) and 17.30-17.55 GHz (Earth-to-space) frequency bands, and any additional conditions resulting from the coordination of this network.

8. Intelsat's operations in the BSS (Broadcast Satellite Service) Plan frequency band (11.7-12.2 GHz) in ITU Region 1 are pursuant to No. 4.4 of the ITU Radio Regulations and must not cause harmful interference to, nor claim protection from, harmful interference caused by, a station operating in accordance with the ITU Constitution, Convention and Regulations. We find that operations under No. 4.4 are appropriate given that such operations are unlikely to interfere with Region 1 BSS operations, given the limitations in Annex 7 of Appendix 30 (no BSS satellites serving Region 1 shall occupy an orbital position further west than 37.2° W.L.).

9. Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US337, any earth station in the United States and its possessions communicating with the Intelsat 29e space station in the 13.75-14.0 GHz (Earth-to-space) frequency band is required to coordinate through National Telecommunications and Information Administration (NTIA) Interdepartment Radio Advisory Committee (IRAC) Frequency Assignment Subcommittee (FAS) to minimize interference to the National Aeronautics and Space Administration (NASA) Tracking and Data Relay Satellite System, including manned space flight.

10. In the 13.75-14.0 GHz (Earth-to-space) frequency band, receiving space stations in the fixed satellite service must not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations, 47 C.F.R. § 2.106.

11. Operations of any earth station in the United States and its possessions communicating with the Intelsat 29e space station in the 13.75-14.0 GHz (Earth-to-space) frequency band must comply with footnote US356 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356, which specifies a mandatory minimum antenna diameter of 4.5 meters and a non-mandatory minimum and maximum equivalent isotropically radiated powers (EIRP). Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 29e space station in the 13.75-14.0 GHz (Earth-to-space) frequency band must be consistent with No. 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.

12. Operations of any earth station in the United States and its possessions communicating with the Intelsat 29e space station in the 13.77-13.78 GHz (Earth-to-space) frequency band must comply with footnote US357 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US357, which specifies that the maximum EIRP density of emissions not exceed 71 dBW in any 6 MHz band within the 13.77-13.78 GHz (Earth-to-space) frequency band for communications with a space station in geostationary-satellite orbit.<sup>3</sup> Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 29e space station in the 13.77-13.78 GHz (Earth-to-space) frequency band must comply with No. 5.503 of the ITU Radio Regulations, which specifies a required maximum EIRP density of emissions (limit is dependent on antenna diameter) for communications with a space station in geostationary-satellite orbit.

13. Intelsat must coordinate its downlink operations in the 19.7-20.2 GHz (space-to-Earth) frequency band with U.S. Federal systems, including Federal operations to earth stations in foreign countries, in accordance with Footnote US334 to the Table of Frequency Allocations, 47 C.F.R. § 2.106, US334.

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<sup>3</sup> Footnote US357 places a restriction on FSS earth station operations in order to protect government operations in the band, including manned space flight. 47 C.F.R. § 2.106, US357.

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14. Operations of Intelsat 29e in the 6650-6675.2 MHz (Earth-to-space) and 14.47-14.5 GHz (Earth-to-space) frequency bands are subject to the terms of footnotes 5.149 and US342 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, 5.149, US342, which urge applicants to take all practicable steps to protect the radio astronomy service from harmful interference.

15. Operations of Intelsat 29e in the 6425-6725 MHz (Earth-to-space) frequency band is subject to Footnote 5.458 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, Footnote 5.458, which directs Intelsat to bear in mind the needs of the passive services when operating the Intelsat 29e space station.

16. Intelsat's use of the 10.7-10.95 GHz (space-to-Earth), 11.2-11.45 GHz (space-to-Earth), and 12.75-13.25 GHz (Earth-to-space) frequency bands is subject to footnote 5.441 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, 5.441, which states that operations in these bands shall be in accordance with the provisions of Appendix 30B.

17. Intelsat's use of the 10.7-11.7 GHz (space-to-Earth) frequency band is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

18. Intelsat's request for waiver of footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that use of the 5850-5925 MHz (Earth-to-space) frequency band for non-Federal fixed-satellite service is limited to international inter-continental systems, is GRANTED. Use of the 5850-5925 MHz (Earth-to-space) frequency band remains subject to case-by-case electromagnetic compatibility analysis in connection with licensing of earth stations seeking to list Intelsat-29e as a point of communication in this band. Intelsat must not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.

19. Intelsat's requests for waiver of § 25.210(a) of the Commission's rules, 47 C.F.R. § 25.210(a), which requires that all space stations in the Fixed-Satellite Service used for domestic service in the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency bands use orthogonal linear polarization, be designed so that the polarization sense of uplink transmissions is opposite to that of downlink transmissions on the same transponder, and be capable of switching polarization sense upon ground command, is GRANTED. Intelsat asserts that these rules were designed to govern analog video services. We find that because Intelsat 29e will not provide this type of service, waiver will not undermine the purpose of the rule.

20. Intelsat's request for waiver of footnote NG52 of the United States Table of Allocations, 47 C.F.R. § 2.106, NG52, to use the 10.7-11.7 GHz (space-to-Earth) frequency band to offer domestic services on an unprotected, non-interference basis in the United States is GRANTED, as conditioned.<sup>4</sup>

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<sup>4</sup> Intelsat requests a waiver of footnote NG104 to the United States Table of Frequency Allocations and footnote 2 to Section 25.202(a)(1), of the Commission's rules, which limited FSS operations in the 10.7-11.7 GHz frequency band to international-only services. 47 C.F.R. § 2.106, NG104; and footnote 2 47 C.F.R. § 25.202(a)(1). The Commission renumbered footnote NG104 as new footnote NG52 and removed footnote 2 to Section 25.202(a)(1). *See Revisions to Parts 2 and 25 of the Commission's Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14.0-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, 27 FCC Rcd 16510, 16520-21, ¶ 21 (2012) (*ESAA Order*). As a result of this Commission action, Intelsat's request for waiver of footnote 2 to Section 25.202(a)(1) is no longer necessary. Footnote NG52 retains the limitation of FSS operations in the 10.7-11.7 GHz frequency band to international-only services, with an exception not relevant here.

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Intelsat's request involves space-to-Earth transmissions that meet the power-flux-density (pfd) on the ground required to protect fixed-service stations in the 10.95-11.20 GHz (space-to-Earth) and 11.45-11.70 GHz (space-to-Earth) frequency bands.<sup>5</sup> Intelsat has agreed to accept any level of interference from fixed stations, and operators of fixed stations will not be required to coordinate their operations with Intelsat's receive earth stations.<sup>6</sup> Under these circumstances, we determine that no additional coordination burden is placed upon fixed station operators and their ability to expand service in the future would not be restricted in any manner.<sup>7</sup> Grant here, as conditioned, is consistent with prior Commission precedent,<sup>8</sup> and is subject to the following conditions:

- a. Intelsat's space-to-Earth transmissions in the 10.7-11.7 GHz (space-to-Earth) frequency band that provide domestic service are on an unprotected, non-harmful interference basis relative to fixed stations. As such, Intelsat must not cause harmful interference to, or claim protection from, fixed stations to which frequencies in the 10.7-11.7 GHz (space-to-Earth) frequency band have either been already assigned, or to which frequencies in the 10.7-11.7 GHz (space-to-Earth) frequency band may be assigned at a later date. Intelsat must terminate operations in the 10.7-11.7 GHz (space-to-Earth) frequency band upon notification that its operations are causing interference to fixed stations operating in this band, and must immediately inform the Commission, in writing, of such an event.
- b. Intelsat is required to inform its customers, in writing, including end-users receiving service from resellers accessing capacity on the Intelsat 29e space station, that the service in the 10.7-11.7 GHz (space-to-Earth) frequency band with regard to domestic service is being provided on an unprotected basis, and that the potential exists that future licensed fixed stations may cause harmful interference to these earth stations.

21. Intelsat's request for waiver of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, to provide FSS to the United States and its territories using the 12.2-12.5 GHz (space-to-Earth) frequency band and the 17.3-17.55 GHz (Earth-to-space) frequency band on a non-interference, non-protected basis, is GRANTED. Such operations shall be on a non-interference and non-protected basis within the United States and its territories located within ITU Region 2. Waiver is justified because FSS operations in these bands are consistent with No. 5.492 of the ITU Radio Regulations and the closest U.S. BSS Plan entry is at 61.5° W.L.

22. Intelsat's request for waiver of footnote NG52 of the United States Table of Allocations, 47 C.F.R. § 2.106, to use the 12.75-13.25 GHz (Earth-to-space) frequency band to offer domestic services on an unprotected, non-interference basis in the United States is GRANTED. Intelsat's operations within the United States must be limited to a single gateway earth station in this band. As such, we find that waiver does not undermine the purpose of the rules.

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<sup>5</sup> See § 25.208(b).

<sup>6</sup> See Legal Narrative at 5-6.

<sup>7</sup> *PanAmSat Licensee Corp. Application for Authority to Use the Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642, 14646 (Sat. Div., Int'l Bur., 2005).

<sup>8</sup> The Intelsat 1R space station, which is currently authorized to operate at 50.0° W.L., has a waiver of NG104 for the 10.95-11.2 and 11.45-11.7 GHz frequency bands portion of the Ku-band as a condition of its current authorization. See *Policy Branch Information: Action Taken*, Public Notice, Report No. SAT-00713 (IBFS File No. SAT-MOD-20090720-00073, as amended by SAT-AMD-20090820-00091 and SAT-AMD-20091113-00122) (Aug. 5, 2010).

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23. Intelsat's request for a waiver of Section 25.114(d)(3) of the Commission's rules, 47 C.F.R. § 25.114(d)(3), is DISMISSED as moot in light of changes to the rules that render the waiver request unnecessary.<sup>9</sup> Additionally, Intelsat's request for a waiver of Section 25.202(g) of the Commission's rules, 47 C.F.R. 25.202(g), concerning TT&C operations at band edges, is also DISMISSED as unnecessary, because Intelsat's proposed TT&C operations comply with the rule.

24. Intelsat 29e must begin providing service at the 50.0° W.L. orbital location in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-11.95 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space) and 14.0-14.5 GHz (Earth-to-space) frequency bands before the satellite it is replacing, Intelsat 1R (Call Sign S2368), discontinues service at the 50.0° W.L. orbital location. Failure to meet this milestone will render this authorization to operate in these frequency bands NULL and VOID.

25. Intelsat seeks to operate Intelsat 29e in the 5850-5925 MHz (Earth-to-space), 6425-6725 MHz (Earth-to-space), 10.7-10.95 GHz (space-to-Earth), 11.2-11.45 GHz (space-to-Earth), 11.95-12.2 GHz (space-to-Earth), 12.2-12.5 GHz (space-to-Earth), 12.75-13.25 GHz (Earth-to-space), 17.3-17.55 GHz (Earth-to-space), 19.7-20.2 GHz (space-to-Earth), and 29.5-30.0 GHz (Earth-to-space) frequency bands that are not authorized on the Intelsat 1R space station. As part of its application, Intelsat submitted evidence that it had met the first three milestones for the additional frequencies it seeks to include in the Intelsat 29e space station and requested a reduction in the required bond, pursuant to Section 25.165 of the Commission's rules, 47 C.F.R. § 25.165. Based on the evidence provided, the Satellite Division finds that Intelsat has satisfied the first three milestones (execute a binding non-contingent contract for construction, complete the critical design review, and commence construction) required for a geostationary satellite. As a result, the milestone and bond requirements are reduced. Accordingly, this grant of authority in the 5850-5925 MHz (Earth-to-space), 6425-6725 MHz (Earth-to-space), 10.7-10.95 GHz (space-to-Earth), 11.2-11.45 GHz (space-to-Earth), 11.95-12.2 GHz (space-to-Earth), 12.2-12.5 GHz (space-to-Earth), 12.75-13.25 GHz (Earth-to-space), 17.3-17.55 GHz (Earth-to-space), 19.7-20.2 GHz (space-to-Earth), and 29.5-30.0 GHz (Earth-to-space) frequency bands will become NULL and VOID, with no further action on the Commission's part, if Intelsat does not meet the following requirements:

- a. File a bond with the Commission in the amount of \$750,000, pursuant to the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003), within 30 days of this grant (June 22, 2015);
- b. Launch and begin operations within two years (May 21, 2017).

26. The license term for the space station is 15 years and will begin on the date that Intelsat certifies to the Commission that Intelsat 29e has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Intelsat is directed to file its certification of commencement of operation with the Commission within five business days of Intelsat 29e being placed into operation at the 50.0° W.L. orbital location.

27. Intelsat is afforded 30 days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

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<sup>9</sup> Section 25.114(d)(3) of the Commission's rules concerning predicted space station antenna gain contour(s) has been replaced by Section 25.114(c)(4)(vii), and Intelsat provides sufficient information to demonstrate compliance with the provisions of the new rule. See 47 C.F.R. § 25.114(c)(4)(vii).

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28. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.


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Call Sign S2913 Grant Date 05/21/15  
(or other identifier)

From see conditions Term Dates see conditions  
To: conditions

Approved: *Stephen J. Duall*  
Stephen J. Duall  
Chief, Satellite Policy Branch



The stamp features the Federal Communications Commission seal on the left, which includes the text 'FEDERAL COMMUNICATIONS COMMISSION' and 'U.S. DEPARTMENT OF JUSTICE'. To the right of the seal, the word 'GRANTED' is printed in a bold, sans-serif font, followed by a small asterisk. Below this, the text 'International Bureau' is printed in a smaller font. At the bottom of the stamp, the phrase '\*with conditions' is handwritten in black ink.



9-16. Name of Contact Representative

<b>Name:</b>	Jennifer Hindin	<b>Phone Number:</b>	202-719-4975
<b>Company:</b>	Wiley Rein LLP	<b>Fax Number:</b>	
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<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20006-
<b>Attention:</b>		<b>Relationship:</b>	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



TYPE OF SERVICE

<p>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:</p> <p><input checked="" type="checkbox"/> a. Fixed Satellite <input type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input type="checkbox"/> d. Earth Exploration Satellite <input type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one.</p> <p><input type="radio"/> Common Carrier    <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply.</p> <p><input type="checkbox"/> Using U.S. licensed satellites <input type="checkbox"/> Using Non-U.S. licensed satellites</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:</p> <p><input type="radio"/> Connected to a Public Switched Network    <input type="radio"/> Not connected to a Public Switched Network    <input checked="" type="radio"/> N/A</p>	
<p>24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).</p> <p><input checked="" type="checkbox"/> a. C-Band (4/6 GHz)    <input checked="" type="checkbox"/> b. Ku-Band (12/14 GHz) <input checked="" type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower:    Frequency Upper: (Please specify additional frequencies in an attachment)</p>	

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?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> 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?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A

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?  Yes  No  N/A

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.

#### BASIC QUALIFICATIONS

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.  Yes  No

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.  Yes  No

<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><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><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><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>	



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 "party to the application"; for these purposes.

Yes  No

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.

Yes  No

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?

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.)

Intelsat License LLC files this amendment to clarify and supplement the above-referenced pending application with the information set forth in the attached July 9, 2014 letter, Engineering Statement, Schedule S and .gxt files. The remaining information in the pending application is unchanged and incorporated by reference.

Letter/EngineeringSt

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

.GXT Files

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  
Associate General Counsel

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).

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