

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

SES AMERICOM, INC.

Application for Modification of AMC-1
Fixed-Satellite Space Station License

File No. SAT-AMD-20150219-00006

COMMENTS OF INTELSAT LICENSE LLC

Intelsat License LLC (“Intelsat”) hereby comments on the above-captioned application to amend the pending modification application of the AMC-1 satellite (Call Sign S2445) to be located at 129.15° W.L. (the “SES AMC-1 Amendment”).¹ Intelsat operates the Galaxy 12 satellite (Call Sign S2422) at 129.0° W.L.,² 0.15 degrees away from the proposed AMC-1 satellite location, as well as the Galaxy 13 satellite (Call Sign S2386) at 127.0° W.L.³ Intelsat therefore has a clear interest in ensuring that SES’s operations conform to Federal Communications Commission (“FCC” or “Commission”) requirements.

Specifically, Intelsat requests the Commission to include in any grant of the SES AMC-1 Amendment a condition requiring SES to abide by all existing and future coordination and operator-to-operator agreements, such as the coordination agreement between the United States

¹ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-0101068, File No. SAT-AMD-20150219-00006 (Mar. 6, 2015) (Public Notice).

² *Policy Branch Information; Actions Taken*, Report No. SAT-00902, File No. SAT-MOD-20111011-00197 (Sept. 28, 2012) (Public Notice).

³ See *PanAmSat Licensee Corp., Application for authority to launch a fixed satellite service satellite and to operate the C-Band payload of that satellite at 127° W.L.*, Order and Authorization, 18 FCC Rcd 19680 (2003).

and Japan regarding use of the Ku-band frequencies 11.7 – 12.2 GHz and 14.0 – 14.5 GHz at the nominal 127° W.L. and 129° W.L. locations. The Ku-band payload on Intelsat's Galaxy 13 satellite, known as Horizons 1, is licensed by the Administration of Japan.⁴

Moreover, unconditioned, the operation of the AMC-1 satellite's command uplink frequency, 6423.5 MHz, at 129.15° W.L. would cause harmful interference into the Galaxy 12 satellite's communications payload. Therefore, in addition to the condition above, Intelsat also requests that any grant of the SES AMC-1 Amendment be conditional on the non-use of the C-band command uplink within plus or minus six degrees of the Galaxy 12 satellite at 129.0° W.L. unless prior coordination for the use of C-band command uplink has been completed.

For the reasons set forth herein, any grant of the SES AMC-1 Amendment should include both of the conditions proposed above.

⁴ See *Horizons Satellite LLC, Petition for Declaratory Ruling to Add Horizons I to the Permitted Space Station List*, Order, 18 FCC Rcd 24745 (2003). The AMC-1 satellite's modification application includes the 11.7 – 12.2 GHz and 14.0 – 14.5 GHz bands. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-0101068, File No. SAT-AMD-20150219-00006 (Mar. 6, 2015) (Public Notice).

Respectfully submitted,

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April 6, 2015

CERTIFICATE OF SERVICE

I, Derrick Johnson, do hereby certify that on this 6th day of April 2015, a copy of the foregoing Comments of Intelsat License LLC is being sent via first class, U.S. Mail, postage paid, to the following:

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