

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Intelsat License LLC	)	File No. SAT-AMD-20180410-00026
	)	
Amendment to Application for Authority to	)	
Launch and Operate Galaxy 30, a	)	
Replacement Satellite With New	)	
Frequencies, at 125.0° W.L. (235° E.L.)	)	

COMMENTS OF IRIDIUM SATELLITE LLC

Iridium Satellite LLC (“Iridium”)¹ files these comments in response to the above-captioned Amendment² of the application filed by Intelsat License, LLC (“Intelsat”) for authority to launch and operate Galaxy 30 (formerly Galaxy 14R),³ a new space station operating in the geostationary orbit (“GSO”) fixed-satellite service (“FSS”). The Amendment would add various Ku- and Ka-band frequencies, remove certain Ka-band frequencies, and add a Wide Area Augmentation System (“WAAS”) payload.

¹ Iridium provides global, reliable, and low-latency communications services using a large non-geostationary satellite orbit constellation operating in the mobile satellite service (“MSS”). Because of the unique capabilities of the Iridium network, commercial, military, and civilian government users depend on Iridium for mission-critical communications needs. In addition to supporting the missions of the Department of Defense, Iridium supports the core commercial operations of large and economically significant industrial sectors, and a diverse set of civilian public safety functions, including the efforts of our first responders.

² Intelsat License LLC, Amendment to Application for Authority to Launch and Operate Galaxy 30, File No. SAT- AMD-20180410-00026 (filed Apr. 10, 2018) (“Amendment”).

³ Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 14R, File No. SAT-LOA-20170524-00079 (filed May 24, 2017).

Intelsat states that its Amendment “includes the addition of the 19400-19600 MHz and 29100-29250 MHz bands [i.e., the 19.4-19.6 and 29.1-29.25 GHz bands] on the spacecraft, however Intelsat is not seeking authority to operate in these bands.”⁴ Iridium uses these frequencies for its non-geostationary orbit (“NGSO”) MSS feeder links and telemetry, tracking, and control (“TT&C”) operations.

There is no allocation in the FCC’s band plan for GSO FSS operations in the 19.4-19.6 and 29.1-29.25 GHz bands.⁵ The payload Intelsat seeks to launch in these bands, therefore, is a non-conforming use. But Intelsat provides no information for why these frequencies are being included on Galaxy 30 or its future plans, if any, to operate on these frequencies. There is no basis at present, therefore, for making a public interest determination concerning Intelsat’s proposal. Intelsat should be required explain itself.

⁴ Amendment at 2 n.4.

⁵ *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809 at Appendix B (2017).

In addition, the Commission should require as a condition of any grant of authority to launch the 19.4-19.6/29.1-29.25 GHz Galaxy 30 payload that there be no intentional emissions from Galaxy 30 within the 19.4 - 19.6 GHz band, and that any transponders capable of transmission in that band remain shut off.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2018, a copy of the foregoing Comments of Iridium Satellite LLC was sent by first-class, United States mail to the following:

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