

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch and
Operate Galaxy 30, a Replacement
Satellite with New Frequencies, at 125.0°
W.L. (235.0° E.L.)

File No. SAT-AMD-20180410-00026

Call Sign: S3016

RESPONSE OF INTELSAT LICENSE LLC

Intelsat License LLC (“Intelsat”) hereby responds to the comments of Iridium Satellite LLC (“Iridium”)¹ regarding Intelsat’s amendment to the above-referenced application for authority from the Federal Communications Commission (“FCC” or “Commission”) to launch and operate Galaxy 30, a replacement satellite with new frequencies, at the 125.0° W.L. orbital location.² In the amendment, consistent with the FCC’s rules, Intelsat described a Ka-band payload for which it is not seeking operating authority. Iridium’s request for more information and operating conditions on this payload are wholly unnecessary and should be rejected.

In its amendment, Intelsat informed the Commission that the Galaxy 30 satellite will include the capability to transmit in the 19400-19600 MHz and 29100-29250 MHz frequency

¹ Comments of Iridium Satellite LLC, Call Sign S3016, File No. SAT-AMD-20180410-00026 (filed July 16, 2018) (“Iridium Comments”).

² See Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 30, a Replacement Satellite with New Frequencies, at 125.0° W.L Call Sign S3016, File No. SAT-AMD-20180410-00026 (filed Apr. 10, 2018) (“Galaxy 30 Amendment”); Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 14R, a Replacement Satellite with New Frequencies, at 125.0° W.L Call Sign S3016, File No. SAT-LOA-20170524-00079 (filed May 25, 2017). The Galaxy 30 satellite was previously known as Galaxy 14R.

bands, but that Intelsat is not seeking FCC authority to operate in these bands.³ Iridium makes two requests with respect to these frequencies: first, Iridium asserts that Intelsat should be required to “provide[] . . . information for why these frequencies are being included on Galaxy 30” and describe “its future plans, if any, to operate on these frequencies.”⁴ Second, Iridium asks that any authorization to launch the 19400-19600 MHz and 29100-29250 MHz payload include a condition requiring that “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.”⁵

There is no basis for Iridium’s requests. Intelsat is under no obligation to explain the payloads it has decided to include on the spacecraft or describe future plans for frequencies for which Intelsat has not sought operating authority. Further, it is axiomatic that Intelsat may not operate in bands for which it does not have operating authority; a condition reiterating this point would be superfluous. Iridium knows this because it has included frequencies on its own satellites for which it did not seek operating authority, and the Commission did not impose on Iridium the condition Iridium now seeks to impose on Intelsat.⁶ Accordingly, and consistent with past practice,⁷ the Commission should reject Iridium’s requests and grant the Galaxy 30 application expeditiously.

³ Galaxy 30 Application, Legal Narrative at 2 n.4.

⁴ Iridium Comments at 3.

⁵ *Id.*

⁶ *Iridium Constellation LLC, Application for Modification of License to Authorize a Second-Generation NGSO MSS Constellation*, Order and Authorization, 31 FCC Rcd 8675, ¶ 5 (Aug. 1, 2016) (“Like Iridium’s first-generation satellites, the new satellites will be capable of operating in the entire 1616-1626.5 MHz band; however, Iridium here requests no change from the operating frequencies specified for its first-generation satellites.”).

⁷ *See generally id.*; *see also* Application for Authority to Launch and Operate Intelsat 32e, a Replacement Satellite, at 43.1° W.L., File Nos. SAT-RPL-20140221-00026 and SAT-AMD-

Respectfully submitted,

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20150806-00054, Legal Narrative at 1 n.2 (filed Feb. 21, 2014) (explaining that the Intelsat 32e satellite contained a Ka-band payload for which Intelsat was not seeking authorization); Application for Authority to Launch and Operate Intelsat 32e, a Replacement Satellite, at 43.1° W.L., File Nos. SAT-RPL-20140221-00026 and SAT-AMD-20150806-00054 (stamp grant May 11, 2016).

CERTIFICATE OF SERVICE

I, Patricia Destajo, hereby certify that on this 31st day of July, 2018, a copy of the foregoing Response of Intelsat License LLC is being sent via first class, U.S. Mail, postage paid, to the following:

/s/ Patricia Destajo

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