

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC, as debtor in possession

Further Amendment to Application to Modify
Authorization for Galaxy 14 (S2385)

File No. SAT-AMD-_____

**FURTHER AMENDMENT TO APPLICATION TO
MODIFY AUTHORIZATION FOR GALAXY 14**

Intelsat License LLC, as debtor in possession (“Intelsat”), pursuant to Section 25.116 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ herein further amends its pending application to modify the authorization for the Galaxy 14 satellite (S2385) (the “Application”).² Specifically, Intelsat amends its Application to also request authorization to change the satellite’s platform pointing from shifting bias between the summer and winter

¹ 47 C.F.R. § 25.116.

² See Intelsat License LLC, as debtor in possession, Application to Modify Authorization for Galaxy 14, File No. SAT-MOD-20201229-00152 (filed Dec. 29, 2020) (requesting authorization to extend the Galaxy 14 license term through February 28, 2023), as amended by Intelsat License LLC, as debtor in possession, Amendment to Application to Modify Authorization for Galaxy 14, File No. SAT-AMD-20210303-00029 (filed Mar. 3, 2021) (requesting authorization to extend the Galaxy 14 license term through February 29, 2024, to redeploy Galaxy 14 to 32.9° E.L., and for waiver of Commission rules requiring that spacecraft be able to vent pressurized systems at end of life) (the “Application”). See generally *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01546, File Nos. SAT-MOD-20201229-00152 and SAT-AMD-20210303-00029 (Apr. 23, 2021) (Public Notice) (seeking comment on Intelsat’s Application). In this document “Application” refers to the original application as amended on March 3, 2021.

seasons to single bore site pointing. All other information previously provided for the operation of Galaxy 14 at 32.9° E.L. remains unchanged and is incorporated by reference.³ Grant of this Application, as further amended, will serve the public interest by enabling Intelsat to optimize the satellite's coverage area for its customers.

In accordance with the FCC's rules, this amendment has been filed electronically as an attachment to FCC Form 312,⁴ and Intelsat herein provides new GXT files and incorporates by reference the technical information previously provided relating to the Application on Schedule S and in narrative form.⁵ Consistent with Section 1.62 of the Commission's rules,⁶ Intelsat will continue to operate Galaxy 14 pursuant to the terms and conditions of its license until such time as the Commission makes a determination with respect to its Application, as further amended herein.

³ Galaxy 14 is operating at 32.9° E.L. pursuant to Special Temporary Authority, *see e.g.*, *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01579, File No. SAT-STA-20210823-00107 (Sept. 17, 2021) (Public Notice).

⁴ 47 C.F.R. § 25.116(e).

⁵ *See supra* n.2.

⁶ 47 C.F.R. § 1.62.

For the reasons set forth above, Intelsat respectfully requests that the Commission grant this further amendment.

Respectfully submitted,

Intelsat License LLC

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October 5, 2021

Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”), in the *Intelsat-Serafina Order*.¹ In 2012, the International Bureau authorized the transfer of control of Intelsat.² There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

¹ *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007).

² *In the Matter of Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, 27 FCC Rcd 5,226 (2012). The transfer of control was fully consummated on June 14, 2018. See Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, FCC, IB Docket No. 11-205 (filed June 14, 2018).

Exhibit B

FCC Form 312, Response to Question 40: Officers, Directors, and Ten Percent or Greater Shareholders

The officers and directors/managers of Intelsat License LLC and Intelsat License LLC, as debtor in possession, are as follows:

Officers:

David Tolley, Chairman
José Toscano, Deputy Chairman
Michelle Bryan, General Counsel,
Chief Administrative Officer &
Secretary
Mirjana Hervy, Director, Finance

Board of Managers:

David Tolley
José Toscano
Michelle Bryan

The business address of all Intelsat License LLC and Intelsat License LLC, as debtor in possession, officers and members of the Board of Managers is 4, rue Albert Borschette L-1246 Luxembourg.

Intelsat License LLC and Intelsat License LLC, as debtor in possession, are Delaware limited liability companies that are indirectly wholly owned by Intelsat S.A. Specifically, Intelsat License LLC and Intelsat License LLC, as debtor in possession, are wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Ventures S.à r.l., a Luxembourg company, which is in turn wholly owned by Intelsat Alliance LP, a Delaware limited partnership. Intelsat Alliance LP is managed by one general partner and two limited partners—Intelsat Genesis GP LLC, Intelsat Genesis Inc., and Intelsat Jackson Holdings S.A., respectively. Intelsat Genesis GP LLC is a Delaware limited liability company, which is a wholly owned by Intelsat Genesis Inc., a Delaware corporation.

Intelsat Genesis Inc. is a wholly owned subsidiary of Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat Connect Finance S.A., a Luxembourg company, which in turn is wholly owned by Intelsat Envision Holdings LLC, a Delaware limited liability company. Intelsat Envision Holdings LLC is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat Investments S.A., a Luxembourg company, which in turn is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Investment Holdings S.à r.l., a Luxembourg company. Intelsat Investment Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4, rue Albert Borschette, L-1246 Luxembourg.

Intelsat S.A. is a publicly traded company. To the best of Intelsat’s knowledge, and with the exception of BC Partners Holdings Limited (“BCP”), described below, no person or entity holds a ten percent or greater ownership interest in Intelsat S.A. as of October 5, 2021.

Name: BCP
Address: West Wing, Floor 2, Trafalgar Court, Les Banques, St Peter Port,
Guernsey, Channel Islands
Citizenship: Guernsey
Indirect Interest: Approximately 34%¹

¹ The exact indirect interest held by BCP is subject to fluctuation as Intelsat S.A.’s stock is publicly traded.