

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC, as debtor-in-
possession

Amendment to Application to Modify
Authorization for Galaxy 25 (S2154)

File No. SAT-AMD-_____

**AMENDMENT TO APPLICATION TO MODIFY AUTHORIZATION FOR
GALAXY 25**

Intelsat License LLC, as debtor-in-possession (“Intelsat”), pursuant to Section 25.116 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby amends its application to modify the authorization for the Galaxy 25 satellite (S2154) (the “Application”).² Specifically, Intelsat amends its Application to seek authority to operate Galaxy 25 at 66.13° E.L.³ (293.87° W.L.) instead of the previously requested 32.9° E.L. (327.1° W.L.) orbital location.

¹ 47 C.F.R. § 25.116.

² See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01532, File No. SAT-MOD-20201215-00144 (Feb. 26, 2021) (requesting license modification to provide Fixed-Satellite Service in inclined orbit at the 32.9° E.L. orbital location with a seasonal satellite platform basis).

³ The Commission’s rules permit use of the 3700-4200 MHz band outside the contiguous United States. See 47 C.F.R. § 2.106 NG182. See also *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, ¶ 56 (2020) (“Authorizations for FSS and Fixed Service operations outside of the contiguous United States may continue to operate in the entire 3.7-4.2 GHz space.”).

In accordance with the Commission's rules, this application has been filed electronically as an attachment to FCC Form 312.⁴ Intelsat provides the technical information relating to the proposed modification on Schedule S and in narrative form in the attached Engineering Statement.⁵

I. REQUEST TO OPERATE GALAXY 25 AT 66.13° E.L.

Intelsat requests authority to permanently operate the Galaxy 25 satellite in inclined orbit⁶ at the 66.13° E.L. orbital location. Galaxy 25 is licensed to operate at 93.1° W.L.,⁷ and is currently operating at 66.13° E.L. pursuant to STA.⁸

At the 66.13° E.L. orbital location, Galaxy 25 is nominally co-located with Intelsat 17 (S2814), which is licensed to operate at 66.0° E.L.⁹ The chart below illustrates the frequencies used by both satellites.

⁴ 47 C.F.R. § 25.116(e).

⁵ See 47 C.F.R. § 25.114.

⁶ Galaxy 25 began inclined orbit operations in 2018. See Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20161004-00097 (Mar. 23, 2018).

⁷ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01203, File No. SAT-MOD-20161004-00097 (Dec. 9, 2016).

⁸ See, e.g., *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01594, File No. SAT-STA-20211117-00151 (Nov. 26, 2016) (authorizing the use of Galaxy 25's telemetry, tracking, and command ("TT&C") frequencies to maintain the satellite at 66.13° E.L.).

⁹ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00748 File No. SAT-LOA-20100726-00167 (Jan. 7, 2011) (reissued grant with two additional conditions).

	Galaxy 25 at 66.13° E.L.	Intelsat 17 at 66.0° E.L.
3625-3700 MHz		✓
3700-4200 MHz	✓	✓
5850-5925 MHz		✓
5925-6425 MHz	✓	✓
10.95-11.2 GHz		✓
11.45-11.7 GHz		✓
11.7-12.2 GHz	✓	
12.5-12.75 GHz		✓
13.75-14.0 GHz		✓
14.0-14.5 GHz	✓	✓

Galaxy 25's specific TT&C frequencies are: 5926.5 MHz and 6423.5 MHz in the uplink; and 4195.5 MHz, and 4199.5 MHz in the downlink.

II. PUBLIC INTEREST SHOWING

Grant of this modification application, as amended herein, to relocate Galaxy 25 is in the public interest because it will allow Intelsat to provide additional capacity for customers at the nominal 66° E.L. orbital location.

Additionally, grant of this relocation request will not result in an increased risk of harmful interference. As noted above, Galaxy 25 is already located at 66.13° E.L.; Intelsat will operate the satellite's communications payload and TT&C frequencies at 66.13° E.L. in conformance with applicable coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Galaxy 25 at 66.13° E.L. in the 3700-4200 MHz, 5925-6425 MHz, and 14.0-14.5 GHz frequency bands will be conditioned as follows:

- 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.
- 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.¹⁰

IV. CONCLUSION

Based on the foregoing, Intelsat respectfully requests that the Commission grant this Application.

Respectfully submitted,

Intelsat License LLC

By:

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December 13, 2021

¹⁰ See *Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended*, Order of Modification, 23 FCC Rcd 2764, 2769-71 ¶¶ 11-13 (2008).

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*.¹¹ In 2012, the International Bureau authorized the transfer of control of Intelsat.¹² There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

¹¹ *Intelsat Holdings, Ltd., Transferor, and Serafina Holdings Limited, Transferee, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, FCC 07-220, 22 FCC Rcd 22151 (2007).

¹² *Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, DA 12-768, 27 FCC Rcd 5226 (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, Secretary, 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, and 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 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 November 4, 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.