

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Amendment to Application to Launch
and Operate Galaxy 35 (S3143)

File Nos. SAT-RPL-20220414-00041
SAT-AMD-_____

**AMENDMENT TO APPLICATION FOR AUTHORITY
TO LAUNCH AND OPERATE GALAXY 35**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.116 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby amends its application to launch and operate the Galaxy 35 satellite (Call Sign S3143) (the “Application”).² Specifically, Intelsat amends its Application to seek authority to operate Galaxy 35 at 95.05° W.L., instead of the previously requested 95.15° W.L. orbital location. This Amendment requests only a slight, 0.1° change in the specific orbital location at nominal 95° W.L.

In accordance with the Commission’s rules, this application has been filed electronically as an attachment to FCC Form 312.³ Intelsat provides an updated Schedule S to reflect the 95.05° W.L orbital location. All other information provided in the pending Application remains unchanged and is incorporated by reference.

¹ 47 C.F.R. § 25.116.

² See File No. SAT-RPL-20220414-00041 (Apr. 14, 2022) (requesting authority to launch and operate Galaxy 35, a replacement satellite, at 95.15° W.L.)

³ 47 C.F.R. § 25.116(e).

I. REQUEST TO OPERATE GALAXY 35 AT 95.05° W.L.

Intelsat requests authority to permanently operate the Galaxy 35 satellite at the 95.05° W.L. location. Intelsat's application to launch and operate Galaxy 35 remains pending with the Commission.

At the 95.05° W.L. orbital location, Galaxy 35 will be collocated with Intelsat 30 (S2887) and Intelsat 31 (S2924),⁴ two of Intelsat's C/Ku-band satellites currently operating at 95.05° W.L. Galaxy 35 is scheduled for launch in the fourth quarter of 2022 and will replace Galaxy 3C (S2381).⁵

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Grant of this application, as amended herein, to operate Galaxy 35 is in the public interest because it will allow Intelsat to provide additional capacity for customers at the nominal 95° W.L. orbital location. Additionally, grant of this relocation request will not result in an increased risk of harmful interference. Intelsat will operate the satellite's communications payload and TT&C frequencies at 95.05° W.L. in conformance with applicable coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01036, File Nos. SAT-LOA-20121025-00187, SAT-AMD-20121221-00220 (Aug. 15, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01052, File No. SAT-LOA-20140410-00038 (Nov. 7, 2014) (Public Notice).

⁵ Galaxy 3C was recently redeployed to 94.85° W.L. to ensure the long-term safe station-keeping of multiple satellites at the nominal 95° W.L. orbital location—which includes Intelsat 30 (S2887), Intelsat 31 (S2924), Spaceway 3 (S2663), as well as the soon-to-be launched Galaxy 35 (S3143) and HNS-95W (S3017) satellites. See File No. SAT-STA-20220926-00126 (Sept. 26, 2022) (requesting special temporary authority to drift Galaxy 3C to 95.15° W.L.). Galaxy 3C is permanently licensed to operate at 95.05° W.L. See *Intelsat License LLC, Application to Modify Authorization for Galaxy 3C*, Stamp Grant, File Nos. SAT-MOD-20170523-00077, SAT-AMD-20170613-00089 (July 20, 2017) (“*Galaxy 3C Modification Authorization*”). The frequency bands Galaxy 3C is using at 94.85° W.L. are identical to those the satellite used at 95.05° W.L. Further, the change in the location of Galaxy 3C and Galaxy 35 will not result in gaps in customer service during and after the transition of customers from Galaxy 3C to Galaxy 35.

Finally, operation of Galaxy 35 at 95.05° W.L. instead of 95.15° W.L. will serve the public interest by helping to better ensure safe station-keeping on the geostationary arc. Intelsat will internally coordinate operations of its collocated and nominally collocated satellites at the nominal 95° W.L. orbital location. With the exception of Intelsat 30 and Intelsat 31, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 35 at 95.05° W.L. Intelsat is also not aware of any system with an overlapping station-keeping volume with the satellite that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

III. MILESTONE AND BOND REQUIREMENTS

As a replacement satellite, Galaxy 35 is not subject to milestone conditions, and Intelsat is not required to post a bond under Sections 25.164(a) and 25.165(a) of the Commission's rules.⁶

⁶ 47 C.F.R. §§ 25.164(a), 25.165(a).

IV. CONCLUSION

Based on the foregoing, Intelsat respectfully requests that the Commission grant this replacement satellite application as amended.

Respectfully submitted,

Intelsat License LLC

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Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved Intelsat's ownership structure, including foreign ownership.¹ There have been no material changes to Intelsat's ownership since the *2022 Intelsat Order*.

¹ See *Intelsat S.A., as debtor-in-possession (Transferor) and New TopCo S.A. (Transferee)*, Order, IBFS File No. SAT-ASG-20210826-00117, IB Docket No. 21-375, DA-22-162 (rel. Feb. 16, 2022) ("*2022 Intelsat Order*").

Exhibit B

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

Intelsat License LLC is a Delaware limited liability company. The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

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

Board of Managers:

José Toscano
Michelle Bryan

The business address of all Intelsat License LLC officers and members of the Board of Managers is: 7900 Tysons One Place, McLean, Virginia 22102.

Intelsat License LLC is a Delaware limited liability company that is indirectly wholly owned by Intelsat S.A. (formerly named Intelsat Emergence S.A.). Specifically, Intelsat License LLC is wholly owned by Intelsat License Holdings LLC, 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 (Intelsat Genesis GP LLC, a Delaware limited liability company) and two limited partners (Intelsat Genesis Inc., a Delaware corporation, and Intelsat Jackson Holdings S.A., a Luxembourg company). Intelsat Genesis GP LLC is wholly owned by Intelsat Genesis Inc., which is wholly owned by Intelsat Jackson Holdings S.A. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat Connect Finance S.à r.l., 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.à r.l., a Luxembourg company. Intelsat (Luxembourg) S.à r.l. is wholly owned by Intelsat Investments S.à r.l., a Luxembourg company, which in turn is wholly owned by Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat 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.

Pacific Investment Management Company LLC (“PIMCO”), a Delaware limited liability company, serves as the manager or investment advisor for a number of investment funds and other investment vehicles that each hold less than 10% of the voting and non-voting equity interests in Intelsat S.A. However, to the best of Intelsat’s knowledge, as of August 23, 2022, the aggregate total of the voting and non-voting equity interests in Intelsat S.A. held by PIMCO-managed funds and certain parent entities of PIMCO exceeded 10%. Details regarding PIMCO are listed below.

PIMCO

Name: Pacific Investment Management Company LLC
Address: 650 Newport Center Drive, Newport Beach, CA
92660
Citizenship: United States (Delaware)
Indirect Voting Interest: Approximately 32.99%
Indirect Non-Voting Interest: Approximately 32.99%

A complete list of the investment funds and entities collectively controlling a 10% or greater indirect voting and indirect non-voting interest in Intelsat S.A. is set forth in Intelsat's 2022 application for consent to the assignment and transfer of control of authorizations.¹

¹ See Application for Assignment and Transfer of Control of Authorizations held by Intelsat License LLC, as debtor-in-possession, IBFS File No. SAT-ASG-20210826-00117 (filed Aug. 26, 2021).