

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Amendment to Application for
Authority to Operate E50WA (S00796),
an In-orbit Satellite, at 50.3° W.L.

File Nos. SAT-LOA-20260130-00070
SAT-AMD-_____

**AMENDMENT TO APPLICATION FOR AUTHORITY
TO OPERATE E50WA, AN IN-ORBIT SATELLITE, AT 50.3° W.L.**

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 operate the E50WA satellite (Call Sign S00796) (the “Application”).² Specifically, Intelsat amends its Application to add the 12.2-12.7 GHz frequency band to its request to operate E50WA at the 50.3° W.L. orbital location. In accordance with the Commission’s rules, this application has been filed electronically as an attachment to FCC Form 312.³ All other information provided in the pending Application remains unchanged and is incorporated by reference.⁴

¹ 47 C.F.R. § 25.116.

² See Intelsat License LLC, *Application for Authority to Operate E50WA, an In-Orbit Satellite, at 50.3° W.L.*, ICFS File No. SAT-LOA-20260130-00070 (filed Jan. 30, 2026) (“Application”).

³ 47 C.F.R. § 25.116(e).

⁴ The technical materials submitted in the Application include the 12.7-12.7 GHz band.

I. REQUEST TO OPERATE E50WA IN 12.2-12.7 GHZ AT 50.3° W.L.

By this amendment, Intelsat adds the 12.2-12.7 GHz band to its Application for authority to permanently operate the E50WA satellite. The following chart shows the complete list of frequencies Intelsat requests to operate in at 50.3° W.L. (with the new frequency band identified in bold):

Frequencies⁵	10.7-10.95 GHz (space-to-Earth) 10.95-11.2 GHz (space-to-Earth) 11.2-11.45 GHz (space-to-Earth) 11.45-11.7 GHz (space-to-Earth) 11.7-12.2 GHz (space-to-Earth) 12.2-12.7 GHz (space-to-Earth) 13.75-14.0 GHz (Earth-to-space) 14.0-14.5 GHz (Earth-to-space) 17.3-17.8 GHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) frequencies: ⁶ 11.7034 GHz and 11.7046 GHz (space-to-Earth) 13.997 GHz and 13.999 GHz (Earth-to-space) Beacons: 11.198 GHz, 11.452 GHz, 12.5 GHz, and 12.502 GHz
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II. WAIVER REQUEST.

Intelsat’s Fixed Satellite Service (“FSS”) operations in 12.2-12.7 GHz will not cause any more interference or require any more protection than the allocated Broadcasting Satellite Service (“BSS”) in the band and will therefore be consistent with footnote 5.492 of International Telecommunication Union’s (“ITU”) Table of Allocations for Region 2. However, to the extent

⁵ While E50WA is capable of operating in 12.7-12.75 GHz (space-to-Earth) or 17.8-18.4 GHz (Earth-to-space), Intelsat is not seeking authority to operate in these frequencies at 50.3° W.L. See Application at Engineering Statement.

⁶ Intelsat has contracted with Eutelsat to provided TT&C services for E50WA. TT&C operations will be conducted outside of the United States.

necessary, Intelsat requests waiver of the U.S. Table of Allocations to operate E50WA in the 12.2-12.7 GHz band on a protected basis,⁷ which allocates the 12.2-12.7 GHz band to BSS on a co-primary basis with Fixed Services, subject to the protections provided by Appendix 30 of the ITU Radio Regulations. In determining whether a waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”⁸

Good cause exists to waive section 2.106 to allow Intelsat to operate in the FSS in the 12.2-12.7 GHz band on a protected basis. Intelsat’s FSS operations in 12.2-12.7 GHz will be consistent with footnote 5.492 of ITU’s Table of Allocations for Region 2 and will not cause more interference or require more protection from interference than BSS transmissions operating in the band.⁹ Moreover, E50WA will operate 11.2° away from the nearest BSS satellite, located at 61.5° W.L.,¹⁰ further ensuring no risk of harmful interference to BSS operations in the band.

Finally, waiver will serve the public interest by enabling E50WA to provide additional bandwidth for customer services at the 50.3° W.L. orbital location without increasing the risk of harmful interference to other licensed services.

III. CONCLUSION

Grant of this application, as amended herein, to operate E50WA is in the public interest because ensuring continuity of service and providing additional capacity in the United States region from the nominal 50° W.L. orbital location.

⁷ 47 C.F.R. § 2.106.

⁸ *WAIT Radio*, 418 F.2d at 1159.

⁹ *See* 47 C.F.R. § 2.106, footnote 5.492.

¹⁰ *See DISH Satellite Services Corporation, EchoStar 16 (S2844)*, Stamp Grant, ICFS File No. SAT-MOD-20241115-00260 (granted Jan. 24, 2025).

Based on the foregoing, Intelsat respectfully requests that the Commission grant the authorization as amended herein.

Respectfully submitted,

Intelsat License LLC

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July 16, 2026