

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

|                                        |   |                        |
|----------------------------------------|---|------------------------|
| In the Matter of                       | ) |                        |
|                                        | ) |                        |
| Intelsat License LLC                   | ) |                        |
|                                        | ) |                        |
| Application for Authority to Operate   | ) | File No. SAT-A/O-_____ |
| E50WA, an in-Orbit Satellite, at 50.3° | ) |                        |
| W.L.                                   | ) |                        |
|                                        | ) |                        |

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

Intelsat License LLC (“Intelsat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,<sup>1</sup> hereby requests authority to operate E50WA, an in-orbit inclined satellite, at the 50.3° W.L. orbital location, with  $\pm 0.1^\circ$  station-keeping tolerance.<sup>2</sup> E50WA is a non-common carrier Ku-/Ka-band satellite that Intelsat will take control over pursuant to a commercial agreement with its owner, Eutelsat S.A. (“Eutelsat”). E50WA will ensure station-kept service continuity at the nominal 50° W.L. As demonstrated below, Intelsat is legally and technically qualified to operate E50WA as proposed. Grant of this application will serve the public interest by ensuring service continuity and adding new capacity at the nominal 50° W.L. location.

In accordance with the Commission’s requirements,<sup>3</sup> this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

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<sup>1</sup> 47 C.F.R. § 25.114.

<sup>2</sup> E50WA has been renamed multiple times during its life. Most recently, the satellite was named E12WG. The satellite’s international designator is 2008-065A.

<sup>3</sup> 47 C.F.R. § 25.114(c).

**I. INTELSAT IS QUALIFIED TO HOLD THE AUTHORIZATION REQUESTED HEREIN.**

**A. Legal Qualifications**

Intelsat is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat's compliance with the Commission's basic legal qualifications.<sup>4</sup> In addition, Intelsat already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.<sup>5</sup>

**B. Technical Qualifications**

As demonstrated in the attached Form 312, Schedule S, and Engineering Statement, Intelsat is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information required by Section 25.114 of the Commission's rules.<sup>6</sup> In addition, Intelsat's Engineering Statement provides information on compliance with the Commission's orbital debris mitigation rules.

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<sup>4</sup> Because E50WA, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis, Section 310(b) is not applicable to this license. *See Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 n.5 (Int'l Bur. 2004).

<sup>5</sup> *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consol. Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 7368, 7381 ¶ 23 (2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

<sup>6</sup> 47 C.F.R. § 25.114.

## II. BACKGROUND AND PROPOSED OPERATIONS

E50WA was launched on December 20, 2008,<sup>7</sup> and is currently licensed by France. The satellite was recently relocated from 12.5° W.L. to 50.3° W.L. by Eutelsat. Pursuant to a commercial agreement between Intelsat and Eutelsat, Intelsat will acquire control of E50WA once the Commission acts favorably upon the instant request. Accordingly, Intelsat seeks U.S. licensing authority to operate E50WA at 50.3° W.L. in order to ensure continuity of service and provide additional capacity for existing customers. Eutelsat has informed the French regulator that the satellite will be re-flagged to U.S. licensing. At the 50.3° W.L. orbital location E50WA will operate in the following frequencies:

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Frequencies<sup>8</sup></b> | 10.7-10.95 GHz (space-to-Earth)<br>10.95-11.2 GHz (space-to-Earth)<br>11.2-11.45 GHz (space-to-Earth)<br>11.45-11.7 GHz (space-to-Earth)<br>11.7-12.2 GHz (space-to-Earth)<br><br>13.75-14.0 GHz (Earth-to-space)<br>14.0-14.5 GHz (Earth-to-space)<br>17.3-17.8 GHz (Earth-to-space)<br><br>Telemetry, Tracking, and Command (“TT&C”) frequencies: <sup>9</sup><br>11.7034 GHz and 11.7046 GHz (space-to-Earth)<br>13.997 GHz and 13.999 GHz (Earth-to-space)<br><br>Beacons: <sup>10</sup> 11.198 GHz, 11.452 GHz, 12.5 GHz, and 12.502 GHz |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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<sup>7</sup> The end of service life of E50WA is estimated to be November 2029.

<sup>8</sup> While E50WA is capable of operating in 12.2-12.75 GHz (space-to-Earth) and 17.8-18.4 GHz (Earth-to-space), with the exception of the satellite’s beacons at 12.5 GHz and 12.502 GHz, Intelsat is not seeking authority to operate in these frequencies at 50.3° W.L.

<sup>9</sup> Intelsat has contracted with Eutelsat to provided TT&C services for E50WA. TT&C operations will be conducted outside of the United States.

<sup>10</sup> Beacon operations will be consistent with the Region 2 allocation for 12.2-12.7 GHz.

Currently, Intelsat 902 is providing service at the 50.1° W.L. orbital location.<sup>11</sup> To provide additional capacity at this orbital slot, E50WA will be nominally collocated with Intelsat 902. The chart below illustrates the frequencies that will be used by E50WA, as well as the frequencies that are currently used by the Intelsat 902 satellite at the nominal 50° W.L. orbital location.

| Frequency Bands                 | Intelsat 902 | E50WA |
|---------------------------------|--------------|-------|
| 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)  |              | ✓     |
| 13.75-14.0 GHz (Earth-to-space) |              | ✓     |
| 14.0-14.5 GHz (Earth-to-space)  | ✓            | ✓     |
| 17.3-17.8 GHz (Earth-to-space)  |              | ✓     |

E50WA contains new frequencies at 10.7-10.95 GHz, 11.2-11.45 GHz, 11.7-12.2 GHz, 13.75-14.0 GHz, and 17.3-17.8 GHz that Intelsat 902 does not.<sup>12</sup>

Although long-term plans for E50WA are not yet known, to the extent that Intelsat remains the licensee of E50WA at the end of the satellite's life, Intelsat plans to dispose of the spacecraft by moving it to an altitude at or above the altitude established by the Inter-Agency Space Debris Coordination Committee formula.<sup>13</sup>

### III. REQUEST FOR TECHNICAL WAIVERS.

Intelsat requests waiver of (a) Footnote NG52 of the Table of Allocations; (b) 47 C.F.R. § 25.210(j); (c) 47 C.F.R. § 25.283(c); and (d) 47 C.F.R. § 25.114(d)(14)(ii). Grant of these waivers are supported on hardship grounds. Under Section 1.3 of the Commission's rules, the

<sup>11</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01833, File No. SAT-MOD-20240430-00091 (June 28, 2024) (Public Notice).

<sup>12</sup> See Engineering Statement at 4 (explaining the ITU filings E50WA will operate pursuant to).

<sup>13</sup> *Id.* at Section 7..

Commission has authority to waive its rules “for good cause shown.”<sup>14</sup> Good cause exists if “special circumstances warrant a deviation from the general rule and such deviation will serve the public interest” better than adherence to the general rule.<sup>15</sup> In determining whether a waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”<sup>16</sup> Additionally, a waiver of the Table of Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services.”<sup>17</sup>

**A. Waiver of Footnote NG52 for 10.7-11.2 GHz and 11.45-11.7 GHz.**

Intelsat requests waiver of Footnote NG52 of the Table of Allocations, which restricts the use of the 10.7-11.2 GHz and 11.45-11.7 GHz bands by the non-federal GSO FSS to international systems only.<sup>18</sup>

Good cause exists to waive the international-only requirements for the 10.7-11.2 GHz and 11.45-11.7 GHz frequency bands on E50WA. The purpose of NG52 is to limit the number of the FSS earth stations with which the co-primary fixed service (“FS”) would need to

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<sup>14</sup> *Id.* § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

<sup>15</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>16</sup> *WAIT Radio*, 418 F.2d at 1159.

<sup>17</sup> See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int’l Bur. 1995) (authorizing MSS in the C-band); see also *Application of Motorola Satellite Communications, Inc. for Modification of License*, Order and Authorization, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

<sup>18</sup> 47 C.F.R. § 2.106, fn. NG52.

coordinate.<sup>19</sup> Precedent has found that waiving NG52 would not undermine the purpose of the rules if the party seeking a waiver: (1) will be utilizing earth stations that are receive-only in these bands and thus “not capable of causing interference into FS stations” operating in the bands; and (2) agrees to “accept any level of interference from FS stations” in these bands.<sup>20</sup>

With respect to the 10.7-11.2 GHz and 11.45-11.7 GHz bands, grant of the requested waiver satisfies these criteria and would be consistent with precedent.<sup>21</sup> The earth stations operating in both these bands with E50WA will not transmit and Intelsat agrees to accept any level of interference into those earth stations from FS stations in the band. Intelsat will provide services in the 10.7-11.2 GHz and 11.45-11.7 GHz frequency bands only on a non-interference/non-protected basis. Accordingly, the earth stations operating in these bands pose no interference concerns with respect to co-frequency FS stations and therefore will not need to be coordinated with FS stations located within the United States and its territories.

Intelsat also agrees to abide by the customer notification requirements that have been previously imposed when granting waivers of NG52.<sup>22</sup> Intelsat will inform its customers in writing, including any customers receiving end-user services from resellers accessing capacity on E50WA, of the potential for interference from FS operations in the 10700-11200 MHz and 11450-11700 MHz bands.

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<sup>19</sup> See *Satellite Services*, 26 RR 2d 1257, 1263-65. See also *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83° W.L. Orbital Location*, Order and Authorization, 20 FCC Rcd 919 ¶ 9 (Int’l Bur. 2004) (“EchoStar 83° Waiver”).

<sup>20</sup> EchoStar 83° Waiver ¶ 13.

<sup>21</sup> See, e.g., *DIRECTV Enterprises, LLC, Fleet Management Notice for SKY-B1 Satellite*, File No. SAT-MOD-20170221-00019, Condition 10 (stamp grant, reissued May 11, 2017).

<sup>22</sup> See, e.g., *Intelsat North America Request for Waiver*, File No. SAT-MOD-20050610-00122, Condition 3 (stamp grant with conditions issued Sept. 30, 2005); EchoStar 83° Waiver ¶ 13.

**B. Waiver Request of 47 C.F.R. § 25.210(j).**

Intelsat requests that the FCC grant a waiver of the  $\pm 0.05^\circ$  East/West station-keeping requirement, 47 C.F.R. § 25.210(j), and authorize E50WA to instead operate within a  $0.1^\circ$  station-keeping box. Increasing the E50WA satellite's East/West tolerance would conserve fuel because the need for eccentricity maneuvers would be significantly reduced. The resulting fuel savings will maximize the use of the satellite and promote the continued efficient use of orbital resources. Waiver in these circumstances is also consistent with Commission precedent.<sup>23</sup> Grant of a  $0.1^\circ$  station-keeping box will not result in harmful interference to adjacent satellites or affect the station-keeping of any other spacecraft. A list of operational satellites within  $\pm 6^\circ$  of the  $51.3^\circ$  W.L. orbital location is provided in the table below:

| Satellite Name | Location   | Operator                       |
|----------------|------------|--------------------------------|
| Intelsat 14    | 45.0 W.L.  | Intelsat (SES)                 |
| TDRSS (TDRS-6) | 47.0 W.L.  | SpaceData International (NASA) |
| SES-14         | 47.5 W.L.  | SES                            |
| Intelsat 902   | 50.1 W.L.  | Intelsat (SES)                 |
| E50WA          | 50.3° W.L. | Intelsat (SES)                 |
| Intelsat 23    | 53.0 W.L.  | Intelsat (SES)                 |
| Inmarsat 5F2   | 55.0 W.L.  | Inmarsat                       |
| Intelsat 34    | 55.5 W.L.  | Intelsat (SES)                 |

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<sup>23</sup> See, e.g., *Application of Intelsat License LLC to Modify Authorization for Intelsat 902* (S2406), ICFS File No. SAT-MOD-20240430-00091, Stamp Grant, ¶ 19 (granted June 26, 2024) (waiving Section 25.210(j) of the Commission's rules); *Petition for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List for Ku- and S-band Operations at 143° W.L.*, ICFS File No. SAT-PDR-20191205-00143, Stamp Grant, ¶ 19 (granted Apr. 29, 2020) (waiving same because "operating HISPASAT 143W-1 at a  $\pm 0.1^\circ$  station-keeping tolerance will have no adverse impact on other operators" and "will also allow Intelsat to conserve fuel and extend the life of HISPASAT 143W-1"); *SES Americom, Inc. Application for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, ¶¶ 10-14 (2005) (agreeing with SES "that increasing the station-keeping volume of the Satcom SN4 spacecraft will not adversely affect the operations of other spacecraft, and would conserve fuel for future operations").

The operation of E50WA with a  $0.1^\circ$  station-keeping box will have a negligible impact on the interference environment for adjacent satellites. Intelsat's proposed operations will conform with all applicable coordination agreements and the Commission's rules governing operations vis-à-vis adjacent locations, including the Commission's two-degree spacing rules.<sup>24</sup> Intelsat has completed coordination with all potentially affected co-frequency operators within 6 degrees of  $50.3^\circ$  W.L.

Further, Intelsat's operation of E50WA with a  $0.1^\circ$  station-keeping box will not affect the station-keeping of any other spacecraft. As shown in the above table, the minimum orbital separation between E50WA and its closest neighbors—Intelsat 902 and Intelsat 23—are  $0.2^\circ$  and  $2.7^\circ$ , respectively. For this reason, increasing E50WA's station-keeping box to  $0.1^\circ$  will not affect the station-keeping of any other operational satellite because, even assuming a  $0.1^\circ$  station-keeping box for nearby satellites, there will be no overlapping station-keeping tolerances. Further, both of these neighboring satellites are operated by Intelsat, and Intelsat will internally coordinate the operations of all three satellites. Finally, Intelsat is not aware of any plans to deploy a geostationary satellite  $\pm 6^\circ$  from the E50WA satellite at  $50.3^\circ$  W.L.

**C. Waiver Request of 47 C.F.R. § 25.283(c).**

Intelsat requests waiver, to the extent necessary, of Section 25.283(c) of the Commission's rules, which require licensees to discharge stored energy remaining at the satellite's end-of-life.<sup>25</sup> Grant of this waiver is supported on hardship grounds.

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<sup>24</sup> See 47 C.F.R. §§ 25.140(a)(3)(i)-(iv) (setting forth power limits on uplink and downlink transmissions to ensure compatibility of GSO FSS space stations at two-degree spacing intervals).

<sup>25</sup> 47 C.F.R. § 25.283(c). A 2015 revision to Section 25.283(c) removing the word "all" from the text of the rule, permitting a *de minimis* residual amount of fuel that cannot be vented to remain in the fuel tanks after decommissioning, may obviate the need to grant waiver in this instance. *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Report and

E50WA is an Airbus Defence and Space Eurostar-3000 model spacecraft,<sup>26</sup> launched in 2008—a model that was not designed to vent all pressurized systems. The helium tanks on E50WA satellite were permanently sealed off following the completion of launch transfer orbit via a pyro valve, and consequently cannot be vented at the satellite’s end-of-life. E50WA is currently on-orbit and a design change cannot be accomplished at this time because the satellite cannot be retrieved from orbit. As such, it is technically impossible to vent the helium tanks. The Commission has previously granted waivers of Section 25.283(c) on hardship grounds for in-orbit satellites in similar circumstances.<sup>27</sup>

**D. Waiver Request of 47 C.F.R. § 25.114(d)(14)(ii).**

Finally, Intelsat requests waiver of Section 25.114(d)(14)(ii) of the Commission’s rules, which requires a statement indicating whether the space station operator has assessed and limited the probability that the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal.<sup>28</sup> It also requires the statement to include whether this probability for an individual space station is 0.01 (1 in 100) or

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Order, 30 FCC Rcd 14713, ¶¶ 359-60 (2015) (corrected by *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Erratum, 31 FCC Rcd 5160 (2016)).

<sup>26</sup> Other Eurostar-3000 model satellites, including U.S.-licensed satellite Intelsat 10-02, are included in the Satellite Industry Association’s list of satellites that do not vent fuel. *See* Letter from Karis A. Hastings, Counsel to SES Americom, Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket No. 02-54 (Oct. 29, 2009) (attaching a list of spacecraft models that cannot vent fuel and requesting a blanket waiver for those satellites included on the list).

<sup>27</sup> *See, e.g., Application of Intelsat License LLC to Modify Authorization for Galaxy 14*, Stamp Grant, File No. SAT-MOD-20201229-00152, ¶ 10 (Feb. 10, 2022) (“This waiver is granted because modification of the spacecraft would present an undue hardship, since Galaxy 14 is an in-orbit space station and venting Galaxy 14’s oxidizer tanks would require direct retrieval of the satellite, which is not currently possible.”).

<sup>28</sup> 47 C.F.R. § 25.114(d)(14)(ii).

less, as calculated using the National Aeronautics and Space Administration's ("NASA") DAS or a higher fidelity assessment tool.<sup>29</sup>

Good cause exists here to waive the orbital debris statement requirements in Section 25.114(d)(14)(ii). E50WA was launched on Dec. 20, 2008, and was procured, designed, and manufactured in the years prior. Intelsat does not have the information needed to use NASA's DAS or other higher fidelity assessment tool to determine the exact probability of whether "the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal," including if the probability is 0.01 or less.<sup>30</sup> Nor does Intelsat have any relationship with the manufacturer with regards to E50WA since it was procured by a third party.

Waiver is appropriate in this case to avoid undue hardship. Even if Intelsat had the information necessary to complete a DAS analysis, the satellite has been on orbit for almost two decades and cannot be retrieved and modified. As such, there is no way to further limit this risk in the event that a DAS analysis would result in an outcome probability above 0.01, and waiving Section 25.114(d)(14)(ii) will not affect the satellite's risk of becoming a source of debris. Grant of waiver also will not impact the satellite's previously approved orbital debris plans.

Finally, grant of waiver is also consistent with Commission precedent. The Commission has granted waivers of 25.114(d)(14)(ii) for other satellites that are on orbit and cannot be modified. For example, the Commission recently waived Section 25.114(d)(14)(ii)'s requirements for Intelsat 9 (Call Sign S2380), concluding that "in the event of a finding that the probability [that the space station will become a source of debris by collision with small debris or

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<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

meteoroids] were greater than 0.01, Intelsat would not be able to reduce the probability except through the addition of shielding or other modification to the space station, which is not currently feasible for an already in-orbit space station.”<sup>31</sup> As a result, in this instance, waiver of the analysis and risk limitation requirements would be consistent with Commission practice.

#### **IV. REQUEST FOR GRANT WITHOUT MILESTONES OR A BOND.**

To the extent necessary, Intelsat requests a waiver of Sections 25.164(a) and 25.165<sup>32</sup> of the rules for any possible milestone or bond associated with the operation of the 10.7-10.95 GHz, 11.2-11.45 GHz, 11.7-12.2 GHz, 13.75-14.0 GHz, and 17.3-17.8 GHz frequency bands, which are on E50WA, but are not currently authorized for operation by Intelsat 902. The Commission should grant this application without imposing a bond because there is no risk of warehousing.<sup>33</sup> Because E50WA is already in orbit at 50.3° W.L., all milestones for this satellite have been satisfied and Intelsat should not be required to post a bond. Indeed, E50WA will be able to provide service from the 50.3° W.L. location immediately upon grant, as opposed to the five years that would be allowed to an applicant intending to construct, launch, and operate a new satellite at this location.<sup>34</sup> The Commission has granted similar applications for in-orbit satellites without imposing milestones or a bond, and accordingly should do the same here.<sup>35</sup>

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<sup>31</sup> *Application of Intelsat License LLC to Modify Authorization for Intelsat 9*, Stamp Grant, ICFS File No. SAT-MOD-20240930-00208, ¶ 13 (Apr. 2, 2025).

<sup>32</sup> 47 C.F.R. §§ 25.164(a), 25.165.

<sup>33</sup> *See Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760 ¶ 170 (2003) (“By making the bond payable upon failure to meet any milestone . . . we further strengthen our protections against speculation and warehousing.”).

<sup>34</sup> *See Loral Skynet Network Services, Inc.*, 21 FCC Rcd 14365 (Int’l Bur. 2006) (“Because Telstar 18 is in-orbit and operating, Loral is not required to post a bond.”).

<sup>35</sup> *See Application of PanAmSat Licensee Corp. to Modify Authorization for Galaxy 11*, File No. SAT-MOD-20080225-00051 (stamp grant July 22, 2008); *PanAmSat Licensee Corp.*,

## **V. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST.**

The authorization requested herein will serve the public interest by ensuring continuity of service and providing additional capacity in the United States region from the nominal 50° W.L. orbital location. The fuel conservation obtained through operating within a 0.1° station-keeping box will maximize the life of the satellite.

Further, with the exception of Intelsat 902, E50WA will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station keeping volume with another satellite. 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 E50WA at 50.3° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with E50WA at 50.3° W.L. that is the subject of an ITU filing and that is either in orbit or progressing toward launch.

## **VI. INTELSAT ACCEPTS SECTION 316 PETITIONS.**

Intelsat understands and accepts that its license to operate E50WA at 50.3° W.L. in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-11.95 GHz, and 14.0-14.5 GHz bands will be conditioned as follows:

- Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the 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

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*Application to Modify Authorization to Relocate Intelsat 5 to 169.0° E.L.*, File No. SAT-MOD-20080725-00150 (stamp grant Oct. 17, 2008).

the obligations of the Public Services Agreement approved by the Twenty-Fifth Assembly of Parties, as amended.<sup>36</sup>

## VII. CONCLUSION.

In light of the foregoing, Intelsat respectfully requests that the Commission grant the authorization requested herein.

Respectfully submitted,

**Intelsat License LLC**

/s/ Cynthia J. Grady

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WILEY REIN LLP  
2050 M Street, NW  
Washington, DC 20036

Cynthia J. Grady  
Assistant General Counsel  
SES Americom  
*on behalf of Intelsat License LLC*

January 30, 2026

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<sup>36</sup> See *Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended*, Order of Modification, 23 FCC Rcd 2764, ¶¶ 11-13 (2008).

## Exhibit A

### FCC Form 312, Response to Question 34: Foreign Ownership

Intelsat License LLC (“Intelsat”) is a Delaware limited liability companies that is indirectly wholly owned by SES S.A. The Commission most recently approved foreign ownership in Intelsat License LLC (“Intelsat”) in the *SES-Intelsat Order*, wherein the Space Bureau authorized the transfer of control of Intelsat.<sup>1</sup> There have been no material changes to Intelsat’s ownership since the *SES-Intelsat Order*.

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<sup>1</sup> See *Intelsat S.A. (Transferor) and SES S.A. (Transferee)*, Memorandum Order and Opinion, SB Docket No. 24-267, DA-25-614, ICFS File Nos. SAT-T/C-20240530-00116, SAT-T/C-20240530-00117, SAT-MPL20240809-00176, SAT-MPL-2024080900177, SAT-MPL-20240809-00179, SEST/C-20240530-01222, SES-T/C-2024060301221 (rel. Jul. 11, 2025) (“*SES-Intelsat Order*”).

## Exhibit B

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

The officers of Intelsat License LLC are as follows:

Aaron Shourie, Chairman  
Nancy Eskenazi, Deputy Chairman  
Diane Watkinson, VP, Tax  
Stephanie Finn, Secretary  
Mirjana Hervy, Director, Finance

The business address of all Intelsat License LLC officers is 7900 Tysons One Place, McLean, Virginia 22102.

Intelsat License LLC is a Delaware limited liability company that is indirectly wholly owned by SES S.A. Specifically, Intelsat License LLC is 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.à r.l., 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.à r.l., a Luxembourg company. Intelsat Jackson Holdings S.à r.l. is wholly owned Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat Holdings S.à r.l. is wholly owned by SES S.A., a Luxembourg company. Each of these entities may be contacted at the following address: Château de Betzdorf, L-6815 Betzdorf, Grand Duchy of Luxembourg.

The names, addresses, and citizenship of stockholders owning of record and/or voting 10 percent or more of SES S.A. voting stock as of July 22, 2025, are:

The **Etat du Grand Duché de Luxembourg** (the “State of Luxembourg”) – and **Banque et Caisse d’Epargne de l’Etat** (“BCEE”) and **Société Nationale de Crédit et d’Investissement** (“SNCI”), each of which is a financial institution 100% owned by the State of Luxembourg, hold Class B shares of SES S.A. representing a combined effective economic interest of 16.67% and effective voting interest of 33.33%. In addition, SES S.A. understands that the State of Luxembourg, BCEE, and SNCI hold a limited number of publicly traded Fiduciary Deposit Receipts (“FDRs”). According to publicly available information as of January 6, 2025, the State of Luxembourg held FDRs representing an economic interest of 1.36% and voting interest of 1.09%. According to SNCI’s 2024 Annual Report, it held FDRs representing an ownership interest of 1.59% as of December 31, 2024. According to the BCEE Annual Report from 2024, BCEE held FDRs representing a 0.92% ownership interest. SES S.A. does not know how many FDRs these entities may have acquired or disposed of since those dates, as they are entitled to buy

and sell FDRs without notice to SES S.A. The principal business of both BCEE and SNCI is financial services.

The address for the State of Luxembourg is Ministry of State, Department of Media, Connectivity, and Digital Policy, 5, rue Plaetis, L-2338 Luxembourg.

The addresses of BCEE and SNCI are as follows:

Banque et Caisse d'Epargne de  
l'Etat 1, place de Metz  
L-1930 Luxembourg

Société Nationale de Crédit et  
d'Investissement 7, rue du Saint-Esprit  
L-1475 Luxembourg

**Atlas Infrastructure Partners (UK) Ltd** ("Atlas") holds a 13.5% economic interest and a 10.9% voting interest in SES S.A. Atlas, a U.K. company, is an investment fund and has the below address:

Atlas Infrastructure Partners (UK) Ltd  
3rd Floor, 25 Watling St.,  
London EC4M 9BR, United Kingdom

**The Lazard Entities:** Lazard Asset Management, LLC, a U.S. investment advisor and hedge fund, and Lazard Asset Management Pacific Company, an Australian investment advisor and wholly owned subsidiary of Lazard Asset Management, LLC, combined hold a 13.4% economic interest and a 10.8% voting interest in SES S.A. The addresses of the Lazard Entities are as follows:

Lazard Asset Management, LLC  
30 Rockefeller Plaza  
New York, NY 10112

Lazard Asset Management Pacific Company  
Level 12 Gateway  
1 Macquarie Place  
Sydney, NSW, 2000