

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 23, a Replacement Satellite With New Frequencies, at 307.0° E.L.

File No. SAT-RPL- \_\_\_\_\_

**APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE  
INTELSAT 23, A REPLACEMENT SATELLITE WITH NEW FREQUENCIES, AT  
307.0° E.L.**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,<sup>1</sup> hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Intelsat 23, at the 307.0° E.L. orbital location. Intelsat 23 is scheduled for launch on an International Launch Services (ILS) proton vehicle in the fourth quarter of 2011 and will replace the Intelsat 707 satellite (call sign S2398), which is currently operating at 307.0° E.L.<sup>2</sup> Intelsat 23 will operate on a non-common carrier basis.<sup>3</sup>

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<sup>1</sup> 47 C.F.R. § 25.114.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00244, DA No. 04-3063 File No. SAT-MOD-20040726-00147 (Sept. 24, 2004) (Public Notice). During traffic transition, Intelsat 707 and Intelsat 23 will occupy the same station-keeping box. Following traffic transition, and subject to receipt of FCC approval, Intelsat 707 will be redeployed to a different location. Intelsat will file an application to relocate the Intelsat 707 satellite as soon as possible after determining a redeployment plan that best meets customer needs.

<sup>3</sup> Section 310(b) is not applicable to this license because Intelsat 23, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis. 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*

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed replacement satellite. Moreover, grant of this application will serve the public interest by ensuring continuity of service to customers at the 307.0° E.L. orbital location. In accordance with the Commission's requirements,<sup>4</sup> this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

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

**A. Legal Qualifications**

Intelsat is legally qualified to hold the replacement 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. 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**

In the attached Form 312, Schedule S, and Engineering Statement, Intelsat demonstrates that it is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information currently required by Section 25.114 of the Commission's rules. In

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*(Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15,424, 15,425 (n.5) (Int'l Bur. 2004).

<sup>4</sup> 47 C.F.R. § 25.114(c).

<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, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, FCC 06-85, ¶ 23 (rel. June 19, 2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

addition, the Engineering Statement provides information on Intelsat's compliance with the Commission's orbital debris mitigation rules.<sup>6</sup>

### C. Waiver Requests

Intelsat requests waiver of the following technical rules:

- (1) Section 25.210(a)(1), which requires space stations providing domestic service in the 5925 – 6425 MHz and 3700 – 4200 MHz bands use orthogonal linear polarization;
- (2) Section 25.210(a)(3), which requires space stations providing domestic service in the 5925 – 6425 MHz and 3700 – 4200 MHz bands be capable of switching polarization sense upon ground command;
- (3) Section 25.210(i)(1), which specifies cross polarization isolation requirements within the primary coverage area; and
- (4) Section 25.202(g), which requires telemetry, tracking and telecommand functions to be allocated at the band edge.

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."<sup>7</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>8</sup> In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."<sup>9</sup> As shown below, there is good cause for each of the requested technical waivers.

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<sup>6</sup> *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11,567 (2004).

<sup>7</sup> 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

<sup>8</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>9</sup> *WAIT Radio*, 418 F.2d at 1159.

### **1. Request for Waiver of Section 25.210(a)(1)**

Intelsat requests waiver of Section 25.210(a)(1) of the Commission's rules. Section 25.210(a)(1) requires that satellites providing domestic service in the 3700 – 4200 MHz and 5925 – 6425 MHz bands use orthogonal linear polarization. Intelsat 23 utilizes circular polarization in these two frequency bands. Except for Intelsat 707 that will be located at 307.0° E.L. only during transfer of traffic to Intelsat 23, the nearest co-frequency satellites adjacent to Intelsat 23 are Intelsat 805, located at 304.5° E.L., and Intelsat 1R, located at 310.0° E.L. Both Intelsat 805 and Intelsat 1R are licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 23 in order to ensure that excessive levels of interference are not generated.

Moreover, the use of circular polarization on Intelsat 23 will make the spacecraft's transmissions similar to those of Intelsat 707 in the 5925 – 6425 MHz and 3700 – 4200 MHz bands. Earth stations currently communicating with the Intelsat 707 satellite will not require any changes to operate with the Intelsat 23 satellite. Hence, Intelsat believes that granting its request for a waiver of the provision of Section 25.210(a)(1) of the rules would be beneficial to existing customers.

### **2. Request for Waiver of Section 25.210(a)(3)**

Intelsat requests waiver of Section 25.210(a)(3) of the Commission's rules. Section 25.210(a)(3) requires that satellites providing domestic service in the 3700 – 4200 MHz and 5925 – 6425 MHz bands be capable of switching polarization upon ground command.

Intelsat 23 does not have capability to switch polarization by ground command in the 3700 – 4200 MHz and 5925 – 6425 MHz bands. However, as noted above, the nearest co-

frequency satellites adjacent to Intelsat 23 are Intelsat 805, located at 304.5° E.L., and Intelsat 1R, located at 310° E.L. – both licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 23 in order to ensure that excessive levels of interference are not generated. Furthermore, Commission precedent supports a grant of Intelsat’s request for a waiver of the provisions of Section 25.210(a)(3) for the Intelsat 23 satellite.<sup>10</sup>

### **3. Request for Waiver of Section 25.210(i)(1)**

Intelsat requests waiver of Section 25.210(i)(1) of the Commission’s rules. Section 25.210(i)(1) requires that satellites be designed to provide a cross-polarization isolation such that the ratio of the on-axis co-polar gain to the on-axis cross-polar gain of the antenna in the assigned frequency band will be at least 30 dB within its primary coverage area. As explained more fully on pages 6 and 7 and Exhibits 5D-1 through 5D-6 of the attached Engineering Statement, the 30 dB requirement is not met within a limited portion of the coverage areas of Intelsat 23’s East Hemi, Mexico and Argentina transmit beams.

Good cause exists to waive the cross-polarization isolation requirement of Section 25.210(i)(1) because a failure to meet the requirement does not adversely affect any other operator.<sup>11</sup> The FCC previously has acknowledged that non-compliance results only in self-interference and granted waivers to other operators in similar situations.<sup>12</sup> In this case, the level

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<sup>10</sup> See *Application to Launch and Operate Replacement Satellite Intelsat 14 at 45 W.L.*, File No. SAT-RPL-20090123-00007 (stamp grant with conditions Oct. 1, 2009).

<sup>11</sup> See *AMC-15 Ku-Band Circular Polarization Amendment*, File No. SAT-AMD-20030422-00069, Attachment Terms and Conditions of Authorization (¶ 5) (Aug. 18, 2004).

<sup>12</sup> See, e.g., *Applications of INTELSAT LLC; For Authority to Operator, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15,460, 15,503 (¶ 109) (2000); *New Skies Satellites N.V.; Petition for Declaratory Ruling*, Order, 17 FCC Rcd 10,369, 10,376-377 (¶ 19) (2002); *Star One S.A. Petition for Declaratory Ruling to Add the Star One C1*

of isolation of the non-compliant Intelsat 23 beams is equal to or greater than 24 dB. This level was the best that the satellite manufacturer could achieve without causing excessive degradation in the co-polarized gain of the beam and/or in the size of its coverage area. Intelsat has taken this level of isolation into account in its planned operations. Accordingly, Commission precedent supports a grant of Intelsat's requested waiver of Section 25.210(i)(1) for Intelsat 23.<sup>13</sup>

#### **4. Request for Waiver of Section 25.202(g)**

Intelsat also requests waiver of Section 25.202(g), which requires satellite operators to conduct TT&C at either or both edges of the allocated band.<sup>14</sup> Intelsat seeks to operate the Intelsat 23 TT&C functions at the center of the C-band. As explained more fully below, operation of Intelsat 23's TT&C functions at the center of the C-band will not cause harmful interference to other satellite operators. Intelsat recognizes that the requested waiver of Section 25.202(g) is not routinely granted and does not intend to relocate the Intelsat 23 satellite to an orbital location serving the United States that was not transferred to Intelsat upon privatization.<sup>15</sup> This waiver is intended to eliminate unnecessary earth station modifications and associated expenses for existing Intelsat customers that will be transitioning services to the Intelsat 23 satellite when it operates at the nominal 307° E.L. orbital location. Finally, Intelsat agrees to accept as a condition a requirement to accommodate future space station networks that are

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*Satellite at 65° W.L. to the Permitted Space Station List*, Order, 19 FCC Rcd 16,334, 16,339 (¶ 12) (2004).

<sup>13</sup> See *Application to Launch and Operate Intelsat 17, a Replacement Satellite, at 66.0 E.L.*, IBFS File No. SAT-LOA-20100726-00167 (stamp grant Nov. 17, 2010; re-issued stamp grant with further conditions Dec. 17, 2010).

<sup>14</sup> 47 C.F.R. § 25.202(g).

<sup>15</sup> See *Petition of the International Telecommunications Satellite Organization under Section 316 of the communications Act, as Amended*, DA 08-444 (Feb. 21, 2008) (identifying orbital locations transferred to Intelsat upon privatization).

compliant with Section 25.202(g) and to operate Intelsat 23 pursuant to any existing or future coordination agreements for this location.<sup>16</sup>

**a. Waiver of Section 25.202(g) Will Not Cause Harmful Interference.**

Intelsat 23's TT&C configuration is identical to that of the Intelsat 707 satellite already operating outside the domestic arc at the nominal 307° E.L. orbital location and is not expected to present a different interference situation to neighboring satellites or require additional coordination. As noted above, the nearest co-frequency satellites adjacent to Intelsat 23 are Intelsat 805, located at 304.5° E.L, and Intelsat 1R, located at 310° E.L. – both licensed to Intelsat. Intelsat will internally coordinate the transmissions to/from these spacecraft and Intelsat 23 in order to ensure that excessive levels of interference are not generated. Hence, Intelsat believes that its request for a waiver of the provisions of Section 25.202(g) is justified.

**b. A Waiver of Section 25.202(g) is Necessary to Avoid Unnecessary Costs to Customers.**

The Intelsat 707 satellite, which is currently operating at the 307.0° E.L. orbital location, along with other legacy Intelsat satellites, was authorized to operate its TT&C functions at the center of the C-band.<sup>17</sup> Consequently, the ground equipment of customers currently receiving service from these satellites is designed to receive the telemetry beacon from the center of the C-band. Customers currently receiving service from the Intelsat 707 satellite and other legacy

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<sup>16</sup> These conditions are consistent with those applied to the Intelsat New Dawn satellite, which received a waiver of Section 25.202(g) of the rules. *See Application to Launch and Operate Replacement Satellite New Dawn at 32.8 E.L.*, File Nos. SAT-LOA-20080509-00101 and SAT-AMD-20081205-00223 (stamp grant with conditions Jan. 9, 2009).

<sup>17</sup> *Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Commc'ns Sys. Geostationary Orbit*, Memorandum Opinion, Order and Authorization, 15 FCC Rcd 15460, Appendix C (2000), recon. denied, 15 FCC Rcd 25234 (2000) (“*Intelsat Licensing Order*”) (granting a waiver of Section 25.202(g) for all satellites authorized in the Intelsat Licensing Order).

Intelsat satellites that will be transitioned to the Intelsat 23 satellite will utilize almost all of the available C-band capacity on the Intelsat 23 satellite. These customers operate a number of earth station antennas that will receive the telemetry beacon from the Intelsat 23 satellite. If the Intelsat 23 satellite does not perform TT&C operations at the center of the C-band, these customers will be required to modify certain ground equipment to receive telemetry beacons from the band edge. Intelsat estimates that these modifications will cost customers thousands of dollars for each earth station that uses a tracking system. Grant of the requested waiver would avoid imposing such costs on these existing customers.

**D. Operational Frequencies**

The following chart shows the frequencies that will be used by the Intelsat 23 satellite at 307.0° E.L. and the frequencies that are currently used by the Intelsat 707 satellite at 307.0° E.L.

<b>Frequency Range</b>	<b>Intelsat 23</b>	<b>Intelsat 707</b>
3700-4200 MHz	X	X
5925-6425 MHz	X	X
10950-11200 MHz		X
11450-11700 MHz	X	X
11700-11950 MHz	X	X
11950-12200 MHz	X	
12500-12750 MHz		X
14000-14250 MHz	X	X
14250-14500 MHz	X	X

All of the existing frequencies on Intelsat 707 except for the 10950-11200 MHz and 12500-12750 MHz band are also on Intelsat 23. In addition, Intelsat 23 contains new frequencies at 11950-12200 MHz that are not on the Intelsat 707 satellite.



### **E. Milestone Demonstration and Request for Bond Reduction**

Intelsat 23 will be subject to the milestone and bond posting requirements set forth in Sections 25.164 and 25.165 of the Commission's rules because the 11950-12200 MHz frequencies are included on Intelsat 23 but are not on the Intelsat 707 satellite it is replacing.<sup>18</sup>

In accordance with Section 25.164(c)-(e) of the Commission's rules,<sup>19</sup> Intelsat is providing with this application the following documentation to demonstrate that it has met the first three milestones required of a geostationary satellite:

(1) a confidential copy of its construction contract (along with a request for confidential treatment under Section 0.457 and 0.459 of the FCC's rules<sup>20</sup>);

(2) a signed statement from Thomas McDermott, Jr., IS-23 Program Director, Orbital Sciences Corporation, attesting to completion of Critical Design Review and attesting that physical construction of the satellite has commenced;

(3) a signed statement from Jean-Luc Froeliger, Senior Director, Space Systems Acquisition, of Intelsat that as of April 1, 2011, Intelsat has paid the payments identified for months 1 through 14 in the Intelsat-23 Payment Schedule, which is Exhibit E to the confidential Fixed Price Contract for the Intelsat 23 (IS-23) Satellite Program Between Orbital Sciences Corporation and Intelsat LLC dated December 10th, 2009; and

(4) photographs evidencing that physical construction of the satellite has commenced.

The Commission allows GSO licensees to reduce their bond amounts by 25 percent each time they meet a satellite milestone.<sup>21</sup> Accordingly, Intelsat requests that the Commission

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<sup>18</sup> 47 C.F.R. §§ 25.164 and 25.165.

<sup>19</sup> 47 C.F.R. § 25.164(c)-(e).

<sup>20</sup> 47 C.F.R. §§ 0.457 and 0.459.

<sup>21</sup> 47 C.F.R. § 25.165(d); *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, ¶ 172 (2003); *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Order on Reconsideration and Fifth Report and Order, 19 FCC Rcd 12637, ¶ 48 (2004) (reducing GSO bond requirement to \$3 million but noting that "GSO licensees will continue to be allowed to reduce their bond amount by 25 percent each time they meet a milestone."); *Star One S.A., Petition for Declaratory Ruling to Add the Star One C1 Satellite a*

determine that the first three milestones for Intelsat 23 have been satisfied and reduce the \$3,000,000 bond amount by 75 percent to \$750,000.

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

The Commission recognizes a “replacement expectancy” in orbital locations in order to protect the large investments made by satellite operators. The agency has stated,

[G]iven the huge costs of building and operating satellite space stations, there should be some assurance that operators will be able to continue to serve their customers. The Commission has therefore stated that, when the orbit location remains available for a U.S. satellite with the technical characteristics of the proposed replacement satellite, it will generally authorize the replacement satellite at the same location.<sup>22</sup>

In this case, Intelsat holds a replacement expectancy for the 307.0° E.L. orbital location because the Commission authorized Intelsat to operate Intelsat 707 at that location.<sup>23</sup> As demonstrated in the attached Engineering Statement and FCC Form 312, Schedule S, Intelsat 23 is technically consistent with Intelsat 707.<sup>24</sup>

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*65° W.L. to the Permitted Space Station List*, 19 FCC Rcd 16334, ¶ 15 (Int’l Bur. 2004) (“Licensees may reduce the amount of the bond upon meeting each milestone.”).

<sup>22</sup> *Columbia Communications Corporation Authorization to Launch and Operate a Geostationary C-band Replacement Satellite in the Fixed-Satellite Service at 37.5° W.L.*, Memorandum Opinion and Order, 16 FCC Rcd 20176, ¶ 7 (2001) (citing *Assignment of Orbital Locations to Space Stations in Domestic Fixed-Satellite Service*, Memorandum Opinion and Order, 3 FCC Rcd 6972, n.31 (1988) and *GE American Communications, Inc.*, Order and Authorization, 10 FCC Rcd 13775, ¶ 6 (Int’l Bur. 1995)).

<sup>23</sup> *See Policy Branch Information; Actions Taken*, Report No. SAT-00244, DA No. 04-3063 File No. SAT-MOD-20040726-00147 (Sept. 24, 2004) (Public Notice).

<sup>24</sup> *Amendment of the Commission's Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760 ¶ 257 (2003) (“We do not require replacement satellites to be technically ‘identical’ to the existing satellite. We recognize that next-generation satellites will incorporate satellites with technical advancements made since the previous generation satellite was launched. We do not intend to change this policy, which facilitates state-of-the-art systems. Rather, we will continue to assess only whether operations of the replacement satellite will be consistent with our international coordination obligations pursuant to regulations promulgated by the International Telecommunication Union.”) (internal citations omitted).

In addition, grant of this application will serve the public interest by ensuring continuity of service to consumers from the nominal 307.0° E.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 307.0° E.L. orbital location before Intelsat 707 reaches the end of its useful life or is relocated, and, as noted above, has made concrete steps toward constructing Intelsat 23.

The Commission has stated that granting replacement applications ensures that service will be provided to consumers as efficiently as possible because the current licensee will be familiar with the service requirements and, given its experience, should be able to deploy a replacement satellite in the shortest possible time.<sup>25</sup> Moreover, Intelsat 23 will also offer expanded capacity to customers at the 307.0° E.L. orbital location. This expansion of capacity also serves the public interest.

### **III. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS**

Intelsat understands and accepts that its license to operate Intelsat 23 at 307.0° E.L., with the exception of the 11950-12200 MHz frequencies, will be conditioned as follows:

- (a) 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.
- (b) 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

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<sup>25</sup> See *Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, 18 FCC Rcd 1962, ¶ 83 (2003) (“Repairing or even replacing a malfunctioning satellite, for all its complexity, requires less time than designing and constructing a new system. Even in the worst case where a satellite is destroyed, a licensee can ordinarily replace a lost satellite with a ground spare at the next available launch window, or procure a technically identical satellite in an expedient manner since it would have already completed the complex design process.”).

of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.<sup>26</sup>

#### **IV. ITU COST RECOVERY**

Intelsat is aware that processing fees are currently charged by the ITU for satellite filings, and that Commission applicants are responsible for any and all fees charged by the ITU.<sup>27</sup>

Intelsat is aware of and unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of Intelsat for the satellite proposed in this Application, as well as any ITU filings associated with any satellite system for which Intelsat may request authorization at a later date.

#### **V. 11.45-11.70 GHZ FREQUENCY BAND**

Intelsat understands that operations in the 11.45-11.70 GHz frequency band are subject to certain limitations and obligations, which Intelsat accepts and will fulfill. Specifically, for operations in the 11.45-11.70 GHz frequency band, Intelsat accepts the following conditions:

- Intelsat's use of the 11450-11700 MHz band (Earth-to-space) is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.
- The operation of the Intelsat 23 space station in the 11450-11700 MHz band (Earth-to-space) is limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

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<sup>26</sup> See *Petition of the Int'l. Telecomms. Satellite Org. under Section 316 of the Commc'ns Act*, as amended, IB 06-137, File No. SAT-MS-20060710-00076, Order of Modification, 23 FCC Rcd 2764, 2769-71 (¶¶11-13)(Int'l Bur. 2008).

<sup>27</sup> See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

**VI. CONCLUSION**

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

Respectfully submitted,

*/s/ Susan H. Crandall*

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July 27, 2011

**Exhibit A**  
**FCC Form 312, Response to Question 34: Foreign Ownership**

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”) (f/k/a Intelsat North America LLC), in the *Intelsat-Serafina Order*.<sup>28</sup> In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.<sup>29</sup> There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

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<sup>28</sup> *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).

<sup>29</sup> *See Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009).

**Exhibit B**  
**FCC Form 312, Response to Question 36: Cancelled Authorizations**

Intelsat License LLC (“Intelsat”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to Intelsat’s former affiliate, PanAmSat Licensee Corp. (“PanAmSat”),<sup>30</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>31</sup> In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by question 36, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on Intelsat’s basic qualifications, which are well-established and a matter of public record.

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<sup>30</sup> All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. See IBFS File Nos. SAT-ASG-20101203-00252 (granted Dec. 23, 2010), SES-ASG-20101203-0150 (granted Dec. 20, 2010), and SES-ASG-20101206-01502 (granted Dec. 20, 2010).

<sup>31</sup> See *PanAmSat Licensee Corp.*, Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).

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

The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

Michael McDonnell, Chairman  
Flavien Bachabi, Deputy Chairman  
Phillip Spector, Secretary  
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell  
Flavien Bachabi  
Phillip Spector

The address of all Intelsat License LLC officers and members of the Board of Managers is:

4 rue Albert Borschette  
L-1246 Luxembourg

Intelsat License LLC is a wholly owned subsidiary of Intelsat License Holdings LLC, a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Subsidiary Holding Company S.A., a Luxembourg company. Intelsat Subsidiary Holding Company S.A. is wholly owned by Intelsat Phoenix Holdings S.A., a Luxembourg company. Intelsat Phoenix Holdings S.A. is wholly owned by Intelsat Intermediate Holding Company S.A., a Luxembourg company. Intelsat Intermediate Holding Company S.A. is wholly owned by Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat S.A., a Luxembourg company. Intelsat S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Global Subsidiary S.A., a Luxembourg company. Intelsat Global Subsidiary S.A. is wholly owned by Intelsat Global S.A., a Luxembourg company (“Intelsat Global”, formerly “Serafina Holdings Limited”). Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *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) (“*Intelsat-Serafina Order*”).