

File # SAT-LOA-20110727-00139



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From conditions To: conditions
Approved: *Susen H. Crandall*
Stephen J. Dault
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS
FCC 312 MAIN FORM
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Application to Launch and Operate Intelsat 23, a Replacement Satellite With New Frequencies, at 307.0 E.L.

1-8. Legal Name of Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation	E-Mail:	susan.crandall@intelsat.com
	3400 International Drive, N.W.		
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Attachment to Grant
IBFS File No. SAT-LOA-20110727-00139
Call Sign S2831
February 23, 2012

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-LOA-20110727-00139, to construct, launch, and operate Intelsat 23 (Call Sign S2831), a C- and Ku-band Geostationary-Satellite Orbit (GSO) space station at the 53° W.L. (307° E.L.) orbital location, is GRANTED.¹ Accordingly, Intelsat is authorized to operate the Intelsat 23 space station at the 53° W.L. orbital location to provide Fixed Satellite Services (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.45-11.95 GHz (space-to-Earth), 11.95-12.2 GHz (space-to-Earth), and the 14.0-14.5 GHz (Earth-to-space) frequency bands. Intelsat is also authorized to conduct telemetry, tracking, and telecommand (TT&C) operations using frequencies centered on 6173.7 MHz and 6176.3 MHz (Earth-to-space) and 3947.5/3948 MHz or 3952/3952.5 MHz (space-to-Earth) to maintain Intelsat 23 at the 53° W.L. orbital location. This authorization is granted in accordance with the technical specifications set forth in Intelsat's application, the Federal Communication Commission's rules, and the following conditions:

1. Intelsat shall prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat shall be held responsible for all cost-recovery fees associated with ITU filings. We also note that no protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. *See* 47 C.F.R. § 25.111(b).
2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
3. Intelsat shall operate the Intelsat 23 space station at the 53° W.L. orbital location in compliance with all existing or future coordination agreements.
4. Intelsat shall maintain its space station within an east-west longitudinal station-keeping tolerance of ±0.05° of its assigned 53° W.L. orbital location.
5. Intelsat's request for a waiver of 25.210(a)(1) of the Commission's rules, 47 C.F.R. § 25.210(a)(1), is granted. Section 25.210(a)(1) requires that C-band operations use orthogonal linear polarization. Intelsat employs circular polarization for its existing Intelsat 707 space station at 53° W.L. This waiver grant is based upon findings that there is currently no potential for harmful interference from operations at this location with circular polarization, and that there would be an undue hardship to existing customers if they were required to reconfigure existing circularly-polarized antennas to operate with linear polarization. As a condition of this waiver, Intelsat must accommodate future satellite networks that are compliant with Section 25.210(a)(1). Further, Intelsat must operate Intelsat 23 pursuant to any existing or future coordination agreements for this location.
6. Intelsat's request for a waiver of 25.210(a)(3) of the Commission's rules, 47 C.F.R. § 25.210 (a)(3), is granted. Section 25.210(a)(3) requires FSS space stations using the C-band to be capable

¹ The application was accepted for filing on August 12, 2011. Policy Branch Information, Space Station Applications Accepted for Filing, *Public Notice*, Report No. SAT-00799 (Aug. 12, 2011). No comments were filed in response to the Public Notice.

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of switching polarization sense upon ground command. The Commission requires polarity-switching capability for two reasons: (1) to provide U.S.-license satellites with the flexibility to operate at different orbital locations, and (2) to mitigate potential interference between adjacent fixed-satellite systems transmitting analog television signals.² This waiver grant is based upon a finding that the ability to switch polarization is not currently necessary to protect other satellites at adjacent orbital locations from harmful interference, and because the Intelsat 23 space station operations will be in compliance with existing coordination agreements. As a condition of granting this waiver, Intelsat must accommodate future satellite networks that are compliant with Section 25.210(a)(3). Further, Intelsat must operate Intelsat 23 pursuant to any existing or future coordination agreements for this location.

7. Intelsat's request for waiver of Section 25.210(i)(1) of the Commission's rules, 47 C.F.R. 25.210(i)(1), is granted. Section 25.210(i)(1) requires space station antennas to be designed to provide a cross-polarization isolation such that the ratio of the on axis co-polar gain to the cross-polar gain of the antenna in the assigned frequency band is at least 30 dB within its primary coverage area. Intelsat indicates that the minimum cross-polarization isolation ratio for Intelsat 23 with respect to the East Hemisphere, Mexico, and Argentina transmit beams is equal or greater than 24 dB. Intelsat states that although part of its coverage area do not meet the requirements of 25.210(i)(1), its failure to meet the requirements will not adversely affect any other operator in this instance. We agree that waiver in this instance will not produce a significant increase in interference, except to the applicant itself. As a condition of the waiver, Intelsat shall claim no more protection from interference from other licensed radiocommunication systems operating in accordance with the Commission's rules than if its antennas met Section 25.210(i)(1) of the rules.

8. Intelsat's request for a waiver of Section 25.202(g) of the Commission's rules, 47 C.F.R. 25.202(g), is granted. Intelsat requests a waiver of Section 25.202(g) of the Commission's rules to allow it to conduct command functions for the Intelsat 23 space station at the 6173.7 and 6176.3 MHz frequencies and telemetry functions on one of two frequency pairs: 3947.5/3948 MHz or 3952/3952.5 MHz. Section 25.202(g) requires "telemetry, tracking and telecommand (TT&C) functions for U.S. domestic satellites shall be conducted at either or both edges of the allocated band(s). Frequencies, polarization and coding shall be selected to minimize interference into other satellite networks and within their own satellite system." This waiver grant is based upon the following findings:

- a. Placement of TT&C in the center of the standard C-band has already been coordinated for the existing satellites at this orbital location, and, therefore, operation of the new satellite would not negatively alter the potential impact on adjacent satellites or require additional coordination;
- b. Altering current coordination arrangements for this and adjacent locations would be unduly disruptive of ongoing operations; and,
- c. Intelsat does not plan to operate this space station in the future at a location capable of serving the contiguous United States (CONUS) that was not transferred to Intelsat upon privatization.

² Telesat Canada; Petition for Declaratory Ruling for of Inclusion of ANIK F3 on the Permitted Space Station List, *Order*, 22 FCC Rcd 588 (para. 10) (Int'l Bur., Sat. Div. 2007).

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As a condition of granting this waiver, Intelsat must accommodate future space station networks that are compliant with Section 25.202(g). Further, Intelsat must operate Intelsat 23 pursuant to any existing or future coordination agreements for this location.

9. The operation of Intelsat 23 in the 11.45-11.70 GHz band is limited to international operations in accordance with footnote NG104 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).

10. Intelsat shall comply with the power levels specified in Section 25.212, 47 C.F.R. § 25.212, of the Commission's rules unless it coordinates any operations using power levels exceeding the levels in Section 25.212 with all potentially affected adjacent satellites within 6 degrees orbital separation of the 53° W.L. orbital location. Intelsat shall inform the Commission of the power levels it has coordinated. In addition, Intelsat must inform all affected earth station operators that Section 25.220 of the Commission's rules applies to operations that exceed the power levels specified in Section 25.212. In no event shall the uplink power density level of Intelsat 23's digital carriers exceed -38.7 dBW/Hz and the downlink EIRP density of such carriers exceed -29.5 dBW/Hz for the C-band. Further, in no event shall the uplink power density of Intelsat 23's digital carriers exceed -45 dBW/Hz and the downlink EIRP density of such carriers exceed -20 dBW/Hz for the Ku-band.

11. Intelsat's operation of Intelsat 23 at the 53° W.L. orbital location in the C-band frequencies of 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space), and the Ku- and extended Ku-band frequencies of 11.45-11.95 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) is subject to the following conditions:

- 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 of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.

12. Intelsat 23 is a replacement for the Intelsat 707 space station (Call Sign S2398) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.45-11.95 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) frequency bands at the 53° W.L. orbital location.³ In addition, Intelsat seeks to operate Intelsat 23 in the 11.95 12.2 GHz band (space-to-Earth) that is not authorized on the Intelsat 707 space station.

³ Intelsat does not seek authority to operate Intelsat 23 on the 10.95 GHz-11.2 GHz (space-to-Earth) or the 12.5-12.75 GHz (space-to-Earth) frequencies on which Intelsat 707 operates. Intelsat 707 is in operation at the 53° W.L. orbital location at the date of this grant. Therefore, this action is without prejudice to any decision regarding Intelsat's replacement expectancy to operate a space station in the 10.95-11.2 GHz and 12.5-12.75 GHz frequency bands at the 53° W.L. orbital location.

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- a. Intelsat 23 must begin providing service at the 53° W.L. orbital locations in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to Space), 11.45-12.20 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) frequency bands before the Intelsat 707 space station discontinues service at the 53° W.L. orbital location. Failure to meet this condition shall render this authorization to operate in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.45-11.95 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) frequency bands NULL and VOID.
- b. As part of its application, Intelsat submitted evidence that it had met the first three milestones for the 11.95-12.2 GHz frequencies it seeks to add to the Intelsat 23 space station and requested a reduction in the required bond, pursuant to Section 25.165 of the Commission's rules, 47 C.F.R. § 25.165. Based on the evidence provided, that Satellite Division finds that Intelsat has satisfied the first three milestones (execute a binding non-contingent contract for construction, complete the critical design review, and commence construction) required for a geostationary satellite. As a result, the milestone and bond requirements are reduced. Accordingly, this grant of authority in the 11.95-12.2. GHz frequency band shall become NULL and VOID, with no further action on the Commission's part, if Intelsat does not meet the following requirements:
 - i. Intelsat must file a bond with the Commission in the amount of \$750,000, pursuant to the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003), within 30 days of this grant (March 24, 2012); and
 - ii. Intelsat 23 must be launched and placed into operation in the 11.95-12.2 GHz (space-to-Earth) frequency bands at the 53 W.L. orbital location within two years following the date of this authorization (February 23, 2014).

13. The license term for the Intelsat 23 space station, Call Sign S2831, is fifteen years and will begin to run on the date that Intelsat certifies to the Commission that the satellite has been successfully placed into orbit and its operation fully conforms to the terms and conditions of this authorization. Intelsat is directed to file its certification with the Chief, Satellite Division, International Bureau within ten days after the space station commences operations at its assigned location.

14. Intelsat is afforded thirty days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

15. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Sections 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within thirty days of the date of the public notice indicating that this action was taken.

File # <u>SAT-LOA-20110727- 00139</u>	
Call Sign <u>S2831</u> Grant Date <u>02/23/12</u>	
(or other identifier)	
see From	Term Dates To:
conditions conditions	
Approved: <u>Stephen J. Dual</u>	
Stephen J. Dual Chief, Satellite Policy Branch	
International Bureau	
GRANTED*	
*with conditions	

9-16. Name of Contact Representative

Name:	Jennifer D. Hindin	Phone Number:	202-719-4975
Company:	Wiley Rein LLP	Fax Number:	202-719-7049
Street:	1776 K Street, NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -
Attention:	Jennifer D. Hindin	Relationship:	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a.
(N/A) a1. Earth Station
a2. Space Station

- b.
 b1. Application for License of New Station
(N/A) b2.. Application for Registration of New Domestic Receive-Only Station
(N/A) b3. Amendment to a Pending Application
(N/A) b4. Modification of License or Registration
(N/A) b5. Assignment of License or Registration
(N/A) b6. Transfer of Control of License or Registration
(N/A) b7. Notification of Minor Modification
(N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
 b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
 b10. Replacement Satellite Application – no new frequency bands
 b11. Replacement Satellite Application – new frequency bands (Not eligible for streamlined processing)
 b12. Petition for Declaratory Ruling to be Added to the Permitted List
(N/A) b13. Other (Please specify)

17c. Is a fee submitted with this application? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R Section 1.1114). <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial educational licensee <input type="radio"/> Other(please explain):	
17c. Fee Classification BNY – Space Station (Geostationary)	
18. If this filing is in reference to an existing station, enter: (a) Call sign of station: Not Applicable	
19. If this filing is an amendment to a pending application enter: (a) Date pending application was filed: Not Applicable (b) File number of pending application: Not Applicable	

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier
- Non-Common Carrier

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network
- Not connected to a Public Switched Network
- N/A

24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)
- b. Ku-Band (12/14 GHz)
- c. Other (Please specify upper and lower frequencies in MHz.)
Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- (N/A) a. Fixed Earth Station
(N/A) b. Temporary-Fixed Earth Station
(N/A) c. 12/14 GHz VSAT Network
(N/A) d. Mobile Earth Station
 e. Geostationary Space Station.
 f. Non-Geostationary Space Station
 g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Not Applicable

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	

BASIC QUALIFICATIONS

<p>35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Eng. Statement – 1</p>
<p>36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Eng. Statement – 2</p>
<p>37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Construction Photos</p>
	<p>38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances</p>
	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>CDR Certification</p>
	<p>39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.</p>
	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Certification</p>

<p>40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.</p>	
<p>41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of &quot;party to the application&quot; for these purposes.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<p>42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<p>42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?</p>	

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC, pursuant to Section 25.114 of the rules of the Federal Communications Commission, hereby applies to launch and operate a replacement C/Ku-band satellite with new frequencies, to be known as Intelsat 23, at the 307.0 E.L. orbital location.

Narrative & Exhibits

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)	
<input type="radio"/> Individual <input type="radio"/> Unincorporated Association <input type="radio"/> Partnership <input type="radio"/> Corporation <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Other (please specify) Limited Liability Company	
45. Name of Person Signing	46. Title of Person Signing
Susan H. Crandall	Asst. General Counsel, Intelsat Corporation
47. Please supply any need attachments.	
1:	2:
	3:
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

Completed Schedule S

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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