

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

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 29e, a Replacement Satellite With New Frequencies, at 50.0° W.L. (310.0° E.L.)

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

**APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE  
INTELSAT 29e, A REPLACEMENT SATELLITE WITH NEW FREQUENCIES, AT  
50.0° 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 applies to launch and operate a C/Ku/Ka-band replacement satellite with new frequencies, to be known as Intelsat 29e, at the 50.0° W.L. (310.0° E.L.) orbital location. Intelsat 29e, the first of Intelsat’s EPIC<sup>NG</sup> platform satellites, is scheduled for launch in the third quarter of 2015 and, after traffic transition, will replace the Intelsat 1R satellite (call sign S2368), which is currently operating at 50.0° W.L.<sup>2</sup> Intelsat 29e 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-00713, File No. SAT-MOD-20090720-00073 (Aug. 6, 2010) (Public Notice) (“Intelsat 1R Authorization”). During traffic transition, Intelsat 1R and Intelsat 29e will occupy the same station-keeping box. Following traffic transition, and subject to receipt of FCC approval, Intelsat 1R will be redeployed to a different location. Intelsat will file an application to relocate the Intelsat 1R 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 29e, 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*

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed replacement satellite with new frequencies. Moreover, grant of this application will serve the public interest by ensuring continuity of service to customers in the C- and Ku-bands at the 50.0° W.L. orbital location and by adding new Ku- and Ka-band capacity at the 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 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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*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 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 25.114(d)(3), which requires "predicted space station antenna gain contour(s) for each transmit and each receive antenna beam and nominal orbital location requested"<sup>7</sup>; (2) Sections 25.202(a)(1) Footnote 2 and 2.106 Footnotes NG104 and US245, which permit the use of the 10700-11700 MHz and 5850-5925 MHz frequency bands by non-federal fixed satellite service for international systems only<sup>8</sup>; and (3) Section 25.204(g), which requires that Ka-band earth stations "employ uplink adaptive power control or other methods of fade compensation such that the earth station transmissions shall be conducted at the power level required to meet the desired link performance while reducing the level of mutual interference between networks."<sup>9</sup>

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."<sup>10</sup> Good cause exists if "special circumstances warrant a deviation

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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. § 25.114(d)(3).

<sup>8</sup> 47 C.F.R. §§ 25.202(a)(1) Footnote 2 and 2.106 Footnotes NG 104 and US 245.

<sup>9</sup> 47 C.F.R. § 25.204(g). In addition, to the extent necessary and out of an abundance of caution, Intelsat requests waiver of Section 25.202(g), which requires that telemetry, tracking and telecommand functions for U.S. domestic satellites be conducted at either or both edges of the allocated band(s). Intelsat 29e will utilize both conventional and extended C-band uplink frequencies (5850-6725 MHz). Intelsat 29e's command frequencies of 6422 MHz and 6424.5 MHz will be conducted near the edge of the conventional C-band ( 5925-6425 MHz). The FCC has previously found that waiver is not necessary where "TT&C operations occur at the band edges of an FSS band in which it is providing service." *See Northrop Grumman Space & Mission Systems Corp.*, Order and Authorization, 24 FCC Rcd 2330, 2362 (¶ 95) (Int'l Bur. 2000).

<sup>10</sup> 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

from the general rule and such deviation will serve the public interest” better than adherence to the general rule.<sup>11</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>12</sup> As shown below, there is good cause for each of the requested technical waivers.

**i. Request for Waiver of Section 25.114(d)(3)**

To the extent necessary, Intelsat requests a waiver of Section 25.214(d)(3) of the Commission’s rules, which requires predicted space station antenna gain contour(s) for each transmit and each receive antenna beam and nominal orbital location requested. Intelsat 29e utilizes multiple spot beam architecture. In light of the large number of Ku-band spot beams on the satellite, Intelsat has provided in Schedule S only the coverage contours of a single representative spot beam type. Additionally, Intelsat has included in Schedule S the beam designation of each spot beam as well as the latitude and longitude of each beam’s maximum gain point on the Earth.

Intelsat believes that this information is sufficient to demonstrate compliance with the provisions of Section 25.114(d)(3) with respect to all of the spot beams. To the extent necessary, however, Intelsat requests a waiver of Section 25.114(d)(3). Given the large number of spot beams, it would be burdensome to supply each beam’s gain contour. The information Intelsat has supplied allows the FCC and adjacent operators to determine the satellite’s interference potential and compliance with the Commission’s technical rules. As such, the provision of additional information for each beam would be both extensive and redundant. The FCC has

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<sup>11</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>12</sup> *WAIT Radio*, 418 F.2d at 1159.

granted waivers to other satellite operators in similar circumstances.<sup>13</sup> Accordingly, good cause for waiver of Section 25.114(d)(3) in this case.

**ii. Request for Waiver of Sections 25.202(a)(1) Footnote 2 and 2.106 Footnotes NG104 and US245**

Intelsat also requests waiver of Sections 25.202(a)(1) Footnote 2 and 2.016 Footnotes NG104 and US245, which permit the use of the 10700-11700 MHz and 5850-5925 MHz bands, respectively, by non-federal fixed satellite service for international systems only. Intelsat 29e utilizes the 10700-11700 MHz and 5850-5925 MHz frequency bands to provide service to U.S. territory. In cases in which an uplink carrier originates within U.S. territory, Intelsat requests a waiver to allow use of the 10700-11700 MHz frequency band for domestic service on a non-interference, non-protected basis. In cases in which a downlink carrier terminates within U.S. territory, Intelsat request a waiver to allow domestic and international non-intercontinental use of the 5850-5925 MHz frequency band on a non-interference, non-protected basis.

Good cause for a waiver exists in this case. Grant of the requested waiver to permit domestic use of these frequencies would be consistent with precedent.<sup>14</sup> Notably, the Intelsat 1R satellite, which the Intelsat 29e satellite will replace, has received waiver of Footnote 2 of Section 25.202(a)(1) and Footnote NG104 of Section 2.106.<sup>15</sup> As in those cases, grant of the

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<sup>13</sup> See, *DIRECTV Group, Inc.*, SAT-MOD-20040614-00114 (2004) (waiving the requirement to provide antenna beam information on Schedule S for each beam on its multiple spot beam SPACEWAY-1 satellite because the beam information provided allowed the FCC to determine compliance with technical rules and the provision of additional beam information would be extensive and, in many ways, redundant).

<sup>14</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-LOA-20101014-00219 (July 29, 2011) (granting waiver of Footnote 2 of Section 25.202(a)(1) and Footnote NG104 of Section 2.106 for Intelsat 18).

<sup>15</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT- -00713, File Nos. SAT-MOD-20090720-00073, SAT-AMD-20091113-00122, SAT-AMD-20090820-00091 (Aug. 6, 2010).

requested waiver will make available additional domestic capacity without risk of harmful interference because Intelsat 29e will operate on a non-interference, non-protected basis.

**iii. Request for Waiver of Section 25.204(g)**

Intelsat additionally seeks waiver of Section 25.204(g), which requires that Ka-band earth stations employ adaptive power control or other methods of fade compensation such that the earth station transmissions shall be conducted at the power level required to meet the desired link performance, while reducing the level of mutual interference between networks. This requirement suggests that the Ka-band spacecraft with which the earth stations communicate would employ a ULPC beacon system.

Intelsat 29e does not include any ULPC beacons at Ka-band frequencies. Intelsat believes, however, that for the contemplated applications using Ka-band frequencies, it will be possible to operate at levels that are consistent with the Commission’s rules without employing fade compensation. As such, Intelsat could not justify the operational penalties associated with the additional mass and power that the inclusion of such a beacon system would require. Because the purpose of the rule would not be undermined here, and given the additional hardship that compliance would entail, waiver is justified.

**D. Operational Frequencies**

The following chart shows the frequencies that will be used by the Intelsat 29e satellite at 50.0° W.L. and the frequencies that are currently used by the Intelsat 1R satellite at 50.0° W.L.

<b>Frequency Band (MHz)</b>	<b>Intelsat 29e (50° W.L.)</b>	<b>Intelsat 1R (50° W.L.)</b>
5850 – 5925	√	
5925 – 6425	√	√
6425 – 6725	√	
12750 – 13250	√	
13750 – 14000	√	√

14000 – 14500	√	√
17300 – 17550	√	
29500 – 30000	√	
3700 – 4200	√	√
10700 – 10950	√	
10950 – 11200	√	√
11200 – 11450	√	
11450 – 11700	√	√
11700 – 11950	√	√
11950 – 12200	√	
12200 – 12500	√	
19700 – 20200	√	

All of the existing frequencies licensed on Intelsat 1R are also on Intelsat 29e. In addition, Intelsat 29e contains new frequencies at 5850-5925 MHz, 6425-6725 MHz, 12750-13250 MHz, 17300-17550 MHz, 29500-30000 MHz, 10700-10950 MHz, 11200-11450 MHz, 11959-12200 MHz, 12200-12500 MHz, and 19700-20200 MHz that are not on the Intelsat 1R satellite.

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

Intelsat 29e 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 5850-5925 MHz, 6425-6725 MHz, 12750-13250 MHz, 17300-17550 MHz, 29500-30000 MHz, 10700-10950 MHz, 11200-11450 MHz, 11959-12200 MHz, 12200-12500 MHz, and 19700-20200 MHz frequencies are included on Intelsat 29e but are not on the Intelsat 1R satellite it is replacing.<sup>16</sup> In accordance with Section 25.164(c)-(e) of the Commission’s rules,<sup>17</sup> Intelsat incorporates by reference the confidential copy of its construction contract (along with the request for confidential treatment

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<sup>16</sup> 47 C.F.R. §§ 25.164 and 25.165.

<sup>17</sup> 47 C.F.R. § 25.164(c)-(e).

under Section 0.457 and 0.459 of the FCC's rules<sup>18</sup>) previously submitted as part of its application for launch and operating authority for Intelsat 27<sup>19</sup> to demonstrate that it has met the first milestone required of a geostationary satellite.

The Commission allows GSO licensees to reduce their bond amounts by 25 percent each time they meet a satellite milestone.<sup>20</sup> Accordingly, Intelsat requests that the Commission determine that the first milestone for Intelsat 29e has been satisfied and reduce the \$3,000,000 bond amount by 25 percent to \$2,250,000.

## **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

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<sup>18</sup> 47 C.F.R. §§ 0.457 and 0.459.

<sup>19</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00904, File No. SAT-LOA-20110610-00105 (Oct. 12, 2012) (Public Notice). Intelsat 29e is part of the multiple satellite package covered in that construction contract.

<sup>20</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 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.”).



replacement satellite, it will generally authorize the replacement satellite at the same location.<sup>21</sup>

In this case, Intelsat holds a replacement expectancy for the 50.0° W.L. orbital location because the Commission authorized Intelsat to operate Intelsat 1R at that location.<sup>22</sup> As demonstrated in the attached Engineering Statement and FCC Form 312, Schedule S, Intelsat 29e is technically consistent with Intelsat 1R.<sup>23</sup>

In addition, grant of this application will serve the public interest by ensuring continuity of service to consumers from the nominal 50.0° W.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 50.0° W.L. orbital location before Intelsat 1R reaches the end of its useful life or is relocated, and, as noted above, has made concrete steps toward constructing Intelsat 29e.

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

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<sup>21</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>22</sup> See Intelsat 1R Authorization, *supra* n.2.

<sup>23</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).

satellite in the shortest possible time.<sup>24</sup> Moreover, Intelsat 29e will also offer expanded capacity to customers at the 50.0° W.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 29e at 50.0° W.L., with the exception of the 6425-6725 MHz, 12750-13250 MHz, 13750-14000 MHz, 17300-17550 MHz, 29500-30000 MHz, 10700-10950 MHz, 11200-11450 MHz, 11950-12200 MHz, and 12200-12500 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 of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.<sup>25</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>26</sup>

Intelsat is aware of and unconditionally accepts this requirement and responsibility to pay any

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<sup>24</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.”).

<sup>25</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>26</sup> See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

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. **USE OF THE 5850-5925 MHZ, 11.45-11.70 GHZ, AND 13.75-14.00 GHZ FREQUENCY BANDS**

Intelsat understands that operations in the 5850-5925 MHz, 11.45-11.70 GHz, and 13.75-14.00 GHz frequency bands are subject to certain limitations and obligations, which Intelsat accepts and will fulfill. Specifically, for operations in the 5850-5925 MHz frequency band, Intelsat accepts the following condition:

- Intelsat's use of the 5850-5925 MHz band (Earth-to-space) is subject to case-by-case electromagnetic compatibility analysis. Intelsat shall not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.

For operations in the 11.45-11.70 GHz frequency band, Intelsat accepts the following condition:

- Intelsat's use of the 11.45-11.70 GHz band (space-to-Earth) 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.

For operations in the 13.75-14.00 GHz band, Intelsat accepts the following conditions:

- In the 13750-14000 MHz band (Earth-to-space), receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.
- Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, any earth station in the United States and its possessions communicating with the Intelsat 29e space station in the 13750-14000 MHz band (Earth-to-space) is required to coordinate through National Telecommunications and Information Administration's (NTIA's) Interdepartment Radio Advisory Committee's (IRAC's) Frequency Assignment Subcommittee (FAS) to minimize interference to the National Aeronautics and Space Administration Tracking and Data Relay Satellite System, including manned space flight.
- Operations of any earth station in the United States and its possessions communicating with the Intelsat 29e space station in the 13750-14000 MHz band

(Earth-to-space) shall comply with footnote US356 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356 which specifies a mandatory minimum antenna diameter of 4.5 meters and a non-mandatory minimum and maximum equivalent isotropically radiated powers (e.i.r.p.). Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 29e space station in the 13750-14000 MHz band (Earth-to-space) shall be consistent with footnote 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.

- Operators of earth stations accessing the Intelsat 29e space station in the 13750-14000 MHz band are encouraged to cooperate voluntarily with the National Aeronautics and Space Administration (NASA) in order to facilitate continued operation of NASA's Tropical Rainfall Measuring Mission (TRMM) satellite.

## 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 22, 2013

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

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”), in the *Intelsat-Serafina Order*.<sup>1</sup> In December 2009 and October 2011, the Commission also approved *pro forma* changes in Intelsat’s foreign ownership.<sup>2</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>1</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>2</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); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011).

**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 a former Intelsat entity, PanAmSat Licensee Corp. (“PanAmSat”),<sup>3</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>4</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>3</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>4</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  
Michelle Bryan, Secretary  
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell  
Flavien Bachabi  
Michelle Bryan

The business 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 Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License Holdings LLC 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 Investments S.A., a Luxembourg company. Intelsat Investments S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Investment Holdings S.à r.l., a Luxembourg company. Intelsat Investment Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat S.A.'s ownership was approved by the Commission as part of the *Intelsat-Serafina Order* and the recent Intelsat Pro Forma 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*”); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011) (“*Intelsat Pro Forma*”). On May 16, 2012, the International Bureau granted an application to transfer control of Intelsat pursuant to a public offering of newly issued voting shares by Intelsat, subsequent voting share sales by current shareholders and possible private placements of newly issued voting shares. *In the Matter of Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, DA 12-768 (rel. May 16, 2012). This change of control has not yet been consummated.