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February 7, 2014

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: Supplement to Application of Intelsat License LLC to Launch and Operate Intelsat 29e, a Replacement Satellite with New Frequencies, at 50.0° W.L., File No. SAT-LOA-20130722-00097 (Call Sign S2913)

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), by counsel, hereby clarifies and supplements its above-referenced pending application to launch and operate Intelsat 29e, a replacement satellite with new frequencies, at 50.0° W.L.

Intelsat Does Not Seek DBS Authority for Intelsat 29e

Intelsat clarifies that the Intelsat 29e application does not request authority to provide direct-broadcast satellite service (“DBS”). The Intelsat 29e satellite would provide fixed-satellite service (“FSS”) from the 50.0° W.L. orbital location and would utilize the 12200 – 12500 MHz frequency band as an FSS downlink and the 17300 – 17550 MHz band as an FSS uplink.¹ To the extent the application is unclear, Intelsat clarifies the Intelsat 29e application and attaches a revised Schedule S to reflect its request for FSS authority.²

¹ In the Intelsat 29e Schedule S as originally filed, the frequency range 17300 – 17550 MHz inadvertently was entered incorrectly as 17300 – 17500 MHz. The attached Schedule S corrects this mistake.

² In the Intelsat 29e FCC Form 312 Main Form, Intelsat selected the box “Fixed Satellite Service”. However, Schedule S Table S2 inadvertently noted “broadcasting satellite service” in the 11700 – 12200 MHz, 17300 – 17550 MHz and 12200–12500 MHz frequency bands. The attached Intelsat 29e Schedule S corrects this error. In addition, in the revised Schedule S the following actions have been taken to enhance the probability that the user will be able to successfully access the information contained therein: 1) with regard to the polarization type in column “e” of section S9, a one letter designation has been provided instead of the

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Request for Waiver of the U.S. Table of Frequency Allocations

Intelsat seeks a waiver of Section 2.106 of the FCC's rules setting forth the U.S. Table of Frequency Allocations to permit the Intelsat 29e satellite to provide to the United States and its territories commercial FSS using the 12200 – 12500 MHz frequency band in the space-to-Earth direction and the 17300 – 17550 MHz frequency band in the Earth-to-space direction.³ More specifically, Intelsat requests authority to permit Intelsat 29e transmissions in these frequencies on a non-interference, non-protected basis to and from its U.S. located earth stations. Intelsat notes that such use is in accordance with the ITU rules pertaining to the Region 2 BSS ("Broadcast Satellite Service") Plan contained in Appendix 30 and 30A of the ITU Radio Regulations.⁴

The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷ Waiver therefore is

(Continued . . .)

polarization type being fully spelled out, and 2) the pdf files contained in column "e" of section S8 have been removed and will be provided as a separate standalone pdf file that should be associated with the Intelsat 29e beams having the Schedule S beam designations G1HU, G2HU, G1VU, G2VU, SGHU, SGVU, U1HU, U2HU, U1VU, U2VU, G1HD, G2HD, G5HD, G1VD, G2VD, G6VD, U1HD, U2HD, U1VD and U2VD.

³ See 47 C.F.R. § 2.106.

⁴ See ITU Radio Regulations, Art. 5, § I (2008).

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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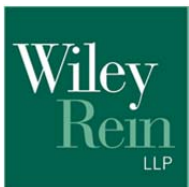
appropriate where special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists for the Commission to grant Intelsat's request for a waiver of the U.S. Table of Frequency Allocations to permit Intelsat 29e's proposed use of the 12200 – 12500 MHz and 17300 – 17550 frequency bands because it will not cause harmful interference to any terrestrial stations or satellites.⁸ As stated above, within those portions of the United States and its territories located within ITU Region 2, Intelsat intends to provide FSS service via Intelsat 29e using frequency bands that are allocated under Section 2.106 of the Commission's rules for use by the Broadcast Satellite Service. However, Intelsat intends to operate Intelsat 29e on a non-interference and non-protected basis within the United States and its territories located within ITU Region 2 and in a manner that is compliant with Appendix 30 and 30A of the ITU Radio Regulations pertaining to the ITU Region 2 BSS Plan. Accordingly, other BSS satellite networks serving the United States in the 12200 – 12500 MHz and 17300 – 17550 MHz bands would be protected to the extent provided under the aforementioned ITU rules. As indicated in the pending Intelsat 29e application, Intelsat has already forwarded to the Commission the Appendix 4 information for the modification of the ITU BSS Region 2 Plan.

Grant of this modification application will serve the public interest. Intelsat 29e will offer expanded capacity to customers at the 50.0° W.L. orbital location through use of the 12200 – 12500 MHz band. Grant of this request is consistent with Commission precedent. Recently, the Commission granted a waiver of the U.S. Table of Frequency Allocations to permit the Intelsat 19 replacement satellite to provide FSS using the 12250 – 12750 MHz frequency band at the 166.0° E.L. orbital location.⁹

⁸ See *Intelsat North America LLC, Application for Authority to Modify Earth Station Authorization to Provide Launch and Early Orbit Phase ("LEOP") Operations for Newly Launched Satellites*, Order and Authorization, 21 FCC Rcd 14672, 14674 (¶ 6) (Int'l Bur. 2006) ("If a proposal will not cause interference to other licensed operations, the Commission generally authorizes it if it is otherwise in the public interest.").

⁹ See *Policy Branch Information; Actions Taken*; Report No. SAT-00925, File No. SAT-MOD-20120628-00107 (Jan. 18, 2013) (Public Notice).



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Please contact the undersigned with any questions.

Sincerely,

/s/ Jennifer D. Hindin

Jennifer D. Hindin
Counsel to Intelsat License LLC