S2924 SAT-LOA-20140410-00038 IB2014000719
Intelsat License LLC
INTELSAT 31

GRANTED *
International Bureau
*with conditions

File # SAT-LOA-20140410-00038
Call Sign S2924 Grant Date 11/06/14
(or other identifier)
Term Dates From see conditions To: see conditions
Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

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Callsign/Satellite ID: S2924

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Authority to Launch and Operate Intelsat 31 Satellite at 95.05 W.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-20140410-00038
Call Sign S2924

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-LOA-20140410-00038 for authority to launch and operate a C- and Ku-band geostationary orbit space station, to be known as Intelsat 31 (Call Sign S2924) at the 95.05° W.L. orbital location, is GRANTED.[1] Intelsat is authorized to operate Intelsat 31 at the 95.05° W.L. orbital location to provide Fixed-Satellite Services (FSS) in the 3400-3700 MHz (space-to-Earth), 6425-6675 MHz (Earth-to-space), 6675-6725 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space) frequency bands.[2] In addition, Intelsat is authorized to conduct telemetry, tracking, and command operations using the frequencies of 11.19425/11.1955 GHz or 11.19625/ 11.19675 GHz (space-to-earth); and 13.9985 GHz and 14.006 GHz (Earth-to-space). Operations under this authorization must be in accordance with the terms, conditions, and technical specifications set forth in Intelsat's application and the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

1. Intelsat must 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 will be held responsible for all cost-recovery fees associated with ITU filings. 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, coordination agreements are successfully completed. 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 with 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 must operate Intelsat 31 at the 95.05° W.L. orbital position in compliance with all existing or future coordination agreements for this location.

4. Intelsat must maintain the Intelsat 31 space station within an east/west longitudinal station-keeping tolerance of ± 0.05 degrees of the 95.05° W.L. orbital location.

5. Intelsat's request for waiver of the requirement to employ state-of-the-art full frequency reuse either through the use of orthogonal polarizations within the same beam and/or the use of spatially independent beams pursuant to Section 25.210(f) of the Commission's rules, 47 C.F.R. § 25.210(f) with respect to the C-band payload of the Intelsat 31 satellite, is GRANTED, as conditioned. In the C-band, Intelsat 31 utilizes only one polarization with its uplink and downlink frequency beams and does not comply with the provisions of Section 25.210(f). Intelsat states, however, that Intelsat 31 will be located in close proximity to another satellite, Intelsat 30 (Call Sign S2887), which has been authorized and is

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[1] The application was placed on Public Notice as accepted for filing on May 16, 2014. *See Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT-01015, (IBFS File No. SAT-LOA-20140410-00038).

[2] Intelsat 31 will provide global coverage from 95.05° W.L. in the C-band frequencies of 3400-3700 MHz (space-to-Earth), 6425-6675 MHz (Earth-to-space), and 6675-6725 MHz (Earth-to-space). Engineering Statement, IBFS File No. SAT-LOA-20140410-00038, at 1. Intelsat states that the 3400-3600 MHz band will not be used in the United States. Legal Narrative, at 6. As per the application, Intelsat 31 will provide coverage of portions of the southwest coast of the United States, South America, and the Caribbean in the Ku-band frequencies of 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space). Engineering Statement, at 1.

was launched on October 16, 2014.[3] The beam polarization utilized by Intelsat 31 is opposite to that which has been authorized for use by Intelsat 30. Thus, Intelsat asserts that, when operating in tandem, Intelsat 30 and Intelsat 31 will employ full frequency reuse and, as a result, satisfy Commission's policy of maximizing the use of transponder capacity. We find that grant of this waiver does not harm the underlying intent of the Commission's full frequency reuse requirement because Intelsat 31 will be co-located and operating in tandem with Intelsat 30. If the underlying basis for the waiver changes, *i.e.*, the paired satellites are no longer co-located and operating in tandem 95.05° W.L. orbital position, this waiver for the C-band payload may be subject to additional terms and conditions as required.

6. Use of the 3400-3600 MHz (space-to-Earth) frequency band is not permitted for non-Federal FSS in the United States Table of Frequency Allocations, 47 C.F.R. § 2.106. Intelsat must not permit any earth station in the United States or its possessions to operate with the Intelsat 31 space station in the 3400-3600 MHz (space-to-Earth) frequency band.[4]

7. Intelsat must inform its customers and operators using the 3400-3600 MHz (space-to-Earth) frequency band of the potential for interference from U.S. government operations worldwide.

8. Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to GN Docket No. 12-354, which limits FSS communications within the United States in the 3600-3650 MHz band on a primary basis to existing earth stations or to new earth stations within 10 miles of existing earth stations.[5] All other FSS earth station operations in the band 3600-3650 MHz must be on a secondary basis.

9. Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 3600-3650 MHz use of the non-Federal FSS is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.

10. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG185, which states that the 3650-3700 MHz use of the non-Federal FSS is limited to international inter-continental systems.

11. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG169 of the United States Table of Frequency Allocations, which states that after December 1, 2000, operations on a primary basis by the FSS (space-to-Earth) in the band 3650-3700 MHz must be limited to grandfathered earth stations. All other FSS earth station operations in the band 3650-3700 MHz must be on a secondary basis.

12. Operations of Intelsat 31 in the 6650-6675.2 MHz and 14.47-14.5 GHz frequency bands must comply with the terms of footnotes 5.149 and US342 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, 5.149, US342, which urge applicants to take all practicable steps to protect the radio astronomy service from harmful interference.

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[3] IBFS File No. SAT-LOA-20121025-00187, as amended by SAT-AMD-20121221-00220, grant stamp, August 14, 2014. *Policy Branch Information, Satellite Space Applications Action Taken*, Public Notice, Report No. SAT-01036 (IBFS File Nos. SAT-LOA-20121025-00187 and SAT-AMD-20121221-00220).

[4] Intelsat states that the 3400-3600 MHz band will not be used in the United States. Legal Narrative, IBFS File No. SAT-LOA-20121025-00187, at 7.

[5] *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Notice of Proposed Rulemaking and Order, 27 FCC Rcd 15594, 15646, ¶ 168 (2012).

13. Intelsat is directed to bear in mind the needs of the passive services when operating the Intelsat 31 space station in the 6425-6675 MHz and 6675-6725 MHz frequency bands pursuant to Footnote 5.458 to the United States Table of Frequency Allocations, 47 C.F.R. §2.106, Footnote 5.458.

14. Intelsat's use of the 10.95-11.2 GHz frequency band is limited to international operations in accordance with footnote NG52 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106 NG52.

15. Intelsat's request for waiver of footnote NG52 of the United States Table of Allocations, 47 C.F.R. § 2.106, to use the 11.45-11.7 GHz frequency band to offer domestic services on an unprotected, non-interference basis in the United States is GRANTED, as conditioned.[6] We find that waiver of footnote NG52 does not undermine the purpose of the rules because the waiver involves only earth stations that are receive-only in the 11.45-11.7 GHz frequency band and thus are not capable of causing interference into fixed stations operating in this band. Furthermore, because Intelsat has agreed to accept any level of interference from fixed stations into its receive-only earth stations' operations in these bands, fixed station operators will not be required to coordinate their station operations with the space station operator's receive-only earth stations' operations.[7] Under these circumstances, we determine that an additional coordination burden is not placed upon fixed station operators and their ability to expand service in the future would not be restricted in any manner.[8] Grant of this waiver is consistent with prior Commission precedent[9] and is subject to the following conditions:

a. Intelsat's space-to-Earth transmissions in the 11.45-11.7 GHz band that provide domestic service are on an unprotected, non-harmful interference basis relative to fixed stations. As such, Intelsat must not cause harmful interference to, or claim protection from, fixed stations to which frequencies in the 11.45-11.7 GHz band have either been already assigned, or to which frequencies in the 11.45-11.7 GHz band may be assigned at a later date. Intelsat must terminate operations in the 11.45-11.7 GHz band upon notification that its operations are causing interference to fixed stations operating in this band, and must immediately inform the Commission, in writing, of such an event.

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[6] 47 C.F.R. § 2.106, NG52

[7] Legal Narrative at 5-6.

[8] *PanAmSat Licensee Corp. Application for Authority to Use the Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642, 14646 (Sat. Div., Int'l Bur., 2005).

[9] The Intelsat Galaxy 3C space station, which is currently authorized to operate at 95.05° W.L, was previously granted this waiver as a condition of its current authorization. IBFS File No. SAT-MOD-20060303-00019 (granted Oct. 27, 2006). On a number of other occasions, the Commission has authorized downlink of domestic service to customer receive-only earth stations in the 10.95-11.2 GHz and 11.45-11.7 GHz bands, subject to conditions. *See* IBFS File No. SAT-MOD-20130513-00068, grant stamp June 27, 2014 (granting waiver of footnote NG52 for Intelsat 701 at the 29.5° W.L. orbital location); *PanAmSat Licensee Corp. Application for Authority to Use the Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642 (Sat. Div., Int'l Bur., 2005); *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-Band Frequencies in the Fixed-Satellite service at the 83° W.L. Orbital Location*, Order And Authorization, 20 FCC Rcd 919, 921-922, ¶ 9 (Sat. Div., Int'l Bur., 2004); *EchoStar Satellite LLC Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-Band Frequencies in the Fixed-Satellite Service at the 109° W.L. Orbital Location,* Order and Authorization, 20 FCC Rcd 930 (Sat. Div., Int'l Bur., 2004); *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-Band Frequencies in the Fixed-Satellite Service at the 121° W.L. Orbital Location*, Order And Authorization, 20 FCC Rcd 942 (Sat. Div., Int'l Bur., 2004).

b. Intelsat is required to inform its customers, in writing, including end-users receiving service from resellers accessing capacity on the Intelsat 31 space station, that the service in the 11.45-11.7 GHz band with regard to domestic service is being provided on an uncoordinated basis, and that the potential exists that future licensed fixed stations may cause harmful interference to these unprotected earth stations.

16. Intelsat's use of the 10.95-11.2 GHz and 11.45-11.7 GHz 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.

17. In the 13.75-14.0 GHz band (Earth-to-space), receiving space stations in the FSS must not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.

18. Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US337, any earth station in the United States and its possessions communicating with the Intelsat 31 space station in the 13.75-13.8 GHz band (Earth-to-space) is required to coordinate earth stations in the fixed-satellite service with the National Telecommunications and Information Administration (NTIA) on a case-by-case basis in order to minimize harmful interference to the Tracking and Data Relay Satellite System's forward space-to-space link (TDRSS forward link-to-LEO).

19. Operators of earth stations accessing the Intelsat 31 space station in the 13.75-14.0 GHz band are encouraged to cooperate voluntarily with NASA in order to facilitate continued operation of the NASA Tropical Rainfall Measuring Mission (TRMM) satellite.[10]

20. Operations of any earth station in the United States and its possessions communicating with the Intelsat 31 space station in the 13.75-14.0 GHz band (Earth-to-space) must comply with footnote US356 to the 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 the maximum equivalent isotropically radiated powers (EIRP) of any emission should be at least 68 dBW and should not exceed 85 dBW. Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 31 space station in the 13.75-14.0 GHz band (Earth-to-space) must 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.

21. Operations of any earth station in the United States and its possessions communicating with the Intelsat 31 space station in the 13.77-13.78 GHz band (Earth-to-space) must comply with footnote US357 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US357, which specifies that a required maximum EIRP density of emissions not exceed 71 dBW in any 6 MHz band for

[10] NASA's TRMM satellite system radar in the 13.793-13.805 GHz band remains operational and is a highly valuable and visible United States asset with a broad range of international users. Accordingly, NTIA has requested cooperation from the Commission and non-Federal Government entities in providing assistance in reducing interference with the TRMM radar. Specifically, NTIA requests that FSS earth stations in the 13.793 - 13.805 GHz band located south of 39° N. and east of 110° W. operate with emission levels below -150 dBW/600 kHz at the TRMM space station receiver. Letter from Frederick R. Wentland, Acting Associate Administrator, Office of Spectrum Management, NTIA, to Don Abelson, Chief, International Bureau, FCC (February 28, 2002). Considering the secondary nature of the TRMM operation, NTIA's request is not a condition of this authorization. The Commission, however, urges all operators of earth stations accessing the Intelsat 31 space station in the 13.75-14.0 GHz band to cooperate voluntarily with NASA in order to facilitate continued operation of the TRMM satellite.

communications with a space station in geostationary-satellite orbit.[11] Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 31 space station in the 13.77-13.78 GHz band (Earth-to-space) must comply with footnote 5.503 to the ITU Radio Regulations, which specifies a required maximum EIRP density of emissions (limit is dependent on antenna diameter) for communications with a space station in geostationary-satellite orbit.

22. Operations of Intelsat 31 to or from the United States must comply with the power levels specified in Section 25.212 of the Commission's rules, 47 C.F.R. § 25.212, unless Intelsat 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 95.05° W.L. orbital location. Intelsat must 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 may the uplink power density level of Intelsat 31's digital carriers operating in the 6425-6725 MHz and 13.75-14.5 GHz band exceed -38.7 dBW/Hz and -45 dBW/Hz, respectively. Further, in no event may the downlink EIRP density of the Intelsat 31 digital carriers operating in: the 3400-3700 MHz band exceed -32 dBW/Hz; the 10.95-11.2 GHz and 11.7-11.948 GHz bands exceed -16.5 dBW/Hz; the 11.45-11.7 GHz band exceed 13.8 dBW/Hz; and the 11.948-12.2 GHz band exceed -15.2 dBW/Hz.

23. Intelsat 31 must begin providing service at the 95.05° W.L. orbital location in the 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 6425-6675 MHz (Earth-to-space), 13.75-14.0 GHz (Earth-to-space) and 14.0-14.5 GHz (Earth-to-space) frequency bands before the satellite it is replacing, Galaxy 3C (Call Sign S2381), discontinues service at the 95.05° W.L. orbital location.[12] Failure to meet this milestone will render this authorization to operate in these frequency bands NULL and VOID.

24. Intelsat's request for waiver of the requirement to post a bond, pursuant to Section 25.165(a) of the Commission's rules, 47 C.F.R. § 25.165(a), is granted. Section 25.165 provides that "[f]or all satellite licenses issued after September 20, 2004, other than DBS licenses, DARS licenses, and replacement satellite licenses as defined in paragraph (e), the licensee is required to post a bond within 30 days of the grant of its license. Failure to post a bond will render the license null and void automatically." The bond requirement discourages speculation and prevents the warehousing of valuable spectrum resources. Intelsat seeks to operate Intelsat 31 at 95.05° W.L. in the 3400-3700 MHz (space-to-Earth), 10.95-11.2 GHz (space-to-Earth), and 6675-6725 MHz (Earth-to-space) frequency bands that are not authorized on the Galaxy 3C space station, thus triggering the requirement to post a bond. However, Intelsat 31 will be co-located at the 95.05° W.L. orbital location with Intelsat 30 and will use the same frequencies as Intelsat 30. The Intelsat 30 application, which was granted on August 14, 2014, is subject to the milestone and bond posting requirements set forth in Sections 25.164 and 25.165 of the Commission's rules for these new frequencies.[13] We find that waiver of the milestone and bond posting requirements for the same frequencies at the same orbital location would not undermine the policy objective of the rule, and that requiring Intelsat to file a bond would not serve the public interest. For the

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[11] Footnote US357 places a restriction on FSS earth station operations in order to protect government operations in the band, including manned space flight. 47 C.F.R. § 2.106, US357.

[12] Intelsat does not seek authority to operate Intelsat 31 at 95.05° W.L. in the 3700-4200 MHz (space-to-Earth) or the 5925-6425 MHz (space-to-Earth) frequencies, which are currently also authorized for use by Galaxy 3C at this location. IBFS File No. SAT-MOD-20060303-00019 (granted Oct. 27, 2006).

[13] *See Policy Branch Information, Satellite Space Applications Actions Taken*, Public Notice, Report No. SAT-01040, (IBFS File No. SAT-LOA-20121025-00187).

same reasons, we also determine that Intelsat is not required to satisfy the milestone schedule established pursuant to Section 25.164 of the Commission's rules with respect to the Intelsat 31 space station. 47 C.F.R. § 25.164.

25. The license term for the space station is 15 years and will begin on the date that Intelsat certifies to the Commission that Intelsat 31 has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Intelsat is directed to file its certification of commencement of operation with the Commission within five business days of Intelsat 31 being placed into operation at the 95.05° W.L. orbital location.

26. Intelsat is afforded 30 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.

27. 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.

FEDERAL COMMUNICATIONS COMMISSION

GRANTED *
International Bureau
*with conditions

File # SAT-LOA-20140410-00038

Call Sign S2924 Grant Date 11/06/14
(or other identifier)

Term Dates
From see conditions To: see conditions

Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

9–16. Name of Contact Representative

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

CLASSIFICATION OF FILING

17. Choose the buttonnext to the classification that applies to thisfiling for both questions a. and b. Choose only one for 17a and only one for 17b.	b.
a. (N/A) a1. Earth Station ◉ a2. Space Station	◉ 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?

◉ If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).

○ Governmental Entity ○ Noncommercial educational licensee

○ 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:

- [x] 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 thebutton next to the applicable status. Choose only one.	22. If earth station applicant, check all that apply.
○ Common Carrier ◉ Non−Common Carrier	Not Applicable

23. If applicant is providng 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).

- [x] a. C−Band (4/6 GHz)
- [x] 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.) Not Applicable

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. ○ Yes ◉ No

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?	○ Yes ◉ No
30. Is the applicant an alien or the representative of an alien?	○ Yes ◉ No ○ N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	○ Yes ◉ No ○ 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?	○ Yes ◉ No ○ 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?	◉ Yes ○ No ○ 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

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.	(●) Yes ( ) No EngineeringStatement
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 explination of circumstances.	(●) Yes ( ) No
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 explination of circumstances.	( ) Yes (●) No
38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attemptiing 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	( ) Yes (●) No
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 exhinit, an explanation of the circumstances.	( ) Yes (●) No

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.	
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 "party to the application" for these purposes.	(●) Yes ( ) No
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.	( ) Yes (●) No
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?	

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 C/Ku-band satellite, to be known as Intelsat 31, at the 95.05 W.L. orbital location. Intelsat 31 is scheduled for launch in the third quarter of 2015 and will be collocated with a new satellite, to be

Narrative

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 specifiedin 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. ( ) C

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.)

- ○ Individual
- ○ Unincorporated Association
- ○ Partnership
- ○ Corporation
- ○ Governmental Entity
- ◉ Other (please specify) Limited Liability Company

45. Name of Person Signing	46. Title of Person Signing
Susan H. Crandall	Assoc. 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

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

43. Description. (Summarize the nature of the application and the services to be provided).

Intelsat License LLC, pursuant to Section 25.114 of the rules of the Federal Communications Commission, hereby applies to launch and operate a C/Ku-band satellite, to be known as Intelsat 31, at the 95.05 W.L. orbital location. Intelsat 31 is scheduled for launch in the third quarter of 2015 and will be collocated with a new satellite, to be known as Intelsat 30 (call sign S2887), which will operate at 95.05 W.L