

May 11, 2015

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

Re: Application to Launch and Operate Intelsat 33e, a Replacement Satellite with New Frequencies at 60.0° E.L.
File No. SAT-LOA-20150327-00016

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) hereby responds to the letter of ABS Global Limited (“ABS”)¹ on the above-captioned application to launch and operate the Intelsat 33e (Call Sign S2939) to be located at 60.0° E.L. (the “Intelsat 33e Application” or “Application”).²

ABS’ letter asserts that the Intelsat 33e Application did not identify a frequency overlap with the ABS-4 satellite at 61° E.L. in the 13.75 – 13.8 GHz band.³ ABS states that “[b]ased upon the information contained in the Intelsat 33e Application, there is a frequency overlap between ABS-4 and Intelsat 33e in the 13.75 – 13.8 GHz band.”⁴ However, according to publicly available information on ABS’ own website⁵ – the ABS-4 satellite does not uplink or downlink in the 13.75 – 13.8 GHz band. As such, the Intelsat 33e Application accurately states that there is no frequency overlap.⁶

¹ Letter from Arlene Kahng, General Counsel, ABS Global Limited, to Ms. Marlene H. Dortch, FCC, File No. SAT-LOA-20150327-00016 (Apr. 15, 2015) (hereinafter “ABS Letter”). ABS letter was sent to the Commission prior to the issuance of Public Notice.

² See *Application of Intelsat License LLC to Launch and Operate Intelsat 33e, a Replacement Satellite with New Frequencies, at 60.0 E.L.*, File no. SAT-LOA-20150327-00016.

³ ABS’ letter also addresses an inconsistency in the data provided in the Intelsat 33e Application. ABS Letter at 1-2. Intelsat filed a supplement correcting this issue prior to the filing date of the ABS letter. See Letter from Jennifer D. Hindin, Counsel for Intelsat License LLC, to Ms. Marlene H. Dortch, FCC, File No. SAT-LOA-20150327-00016 (Apr. 8, 2015).

⁴ ABS Letter at 1.

⁵ More precisely, ABS’ website provides the Uplink / Downlink Frequencies for ABS-4 as 13.858 – 13.883 GHz and 113.824 [sic] – 13.849 GHz. See *ABS Satellite Fleet ABS-4*, ABSSATELLITE.NET, <http://www.absatellite.net/satellite-fleet/?sat=abs4> (last accessed on May 11, 2015).

⁶ See *Application of Intelsat License LLC to Launch and Operate Intelsat 33e, a Replacement Satellite with New Frequencies, at 60.0 E.L.*, File no. SAT-LOA-20150327-00016, Engineering Statement at 66.

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ABS goes on to claim that the interference analysis submitted with the Intelsat 33e Application is “inaccurate and incomplete” because it does not include the ABS-4 satellite.⁷ Even if a frequency overlap between ABS-4 and Intelsat 33e did exist, Intelsat is not required to include ABS-4 in its two-degree analysis for the Intelsat 33e Application. Federal Communications Commission precedent clearly states that “any potential interference arising from operations of space stations licensed by different Administrations that are not within the scope of a grant of access to the U.S. market are appropriately addressed through the satellite coordination procedures of the International Telecommunication Union (ITU) and ... need not be addressed in an applicant’s two degree spacing interference analysis.”⁸ The ABS-4 satellite operates under the jurisdiction of Papua New Guinea⁹ and has not been granted market access. Therefore, the Intelsat 33e Application interference analysis is complete without the inclusion of the ABS-4 satellite.

Respectfully submitted,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall, Federal Communications Commission
Jay Whaley, Federal Communications Commission
Cindy Spiers, Federal Communications Commission
Arlene Kahng, ABS Global Limited
Jennifer D. Hindin, Wiley Rein LLP

⁷ ABS Letter at 1.

⁸ DIRECTTV Enterprises, LLC Application for Authorization to Launch and Operate DIRECTTV KU-45W, *Order and Authorization*, IBFS File No. SAT-LOA-20130205-00016 and SAT-AMD-20130716-00094, at ¶ 9 (rel. Mar. 4, 2015).

⁹ ABS Letter at 1.