

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
)  
**Intelsat License LLC** ) File No. SAT-LOA-20150327-00016  
)  
Application for Authority to Launch and )  
Operate Intelsat 33e, a Replacement )  
Satellite With New Frequencies, at 60.0° )  
E.L. (300.0° W.L.) )

**COMMENTS OF IRIDIUM SATELLITE LLC**

Iridium Satellite LLC (“Iridium”) hereby comments on the above-captioned application (“Application”) filed by Intelsat License, LLC (“Intelsat”). Iridium does not object to a grant of the Application, but requests that any grant be conditioned on Intelsat coordinating its operations in the 29.1-29.3 GHz and 19.4-19.6 GHz bands with Iridium, which operates feeder links in those bands.

**DISCUSSION**

**I. INTRODUCTION**

In its Application, Intelsat seeks authority to launch and operate a new Fixed-Satellite Service (“FSS”) satellite, Intelsat 33e, at 60° E.L. The satellite will replace the Intelsat 904 satellite but will have frequencies that are not on Intelsat 904, including frequencies in the 29.1-29.3 GHz and 19.4-19.6 GHz bands that are used by Iridium for feeder links.

Iridium operates a constellation of 66 Non-Geostationary Satellite Orbit (“NGSO”) mobile satellite service (“MSS”) space stations in low earth orbit. Iridium’s users include individuals, businesses, and a variety of civil and government agencies around the world, including the U.S. Department of Defense.

Every user communication on the Iridium satellite system is routed through a gateway earth station. Iridium’s gateways are licensed to operate on feeder link frequencies that include the 29.1-29.3 GHz and 19.4-19.6 GHz bands that Intelsat proposes to use. Iridium also employs these bands for the TT&C links it uses to control and command its space stations.

## **II. INTELSAT HAS NOT ADDRESSED ITS DUTY TO COORDINATE WITH IRIDIUM**

Intelsat is obligated under Section 25.278 of the Commission’s Rules to coordinate its proposed use of the 29.1-29.3 GHz and 19.4-19.6 GHz bands with Iridium.

The rule states:

Licensees of geostationary fixed-satellite service systems in the frequency bands that are licensed to non-geostationary satellite systems for feeder link operations shall coordinate their operations with the licensees of such non-geostationary satellite systems.<sup>1</sup>

---

<sup>1</sup> 47 C.F.R. § 25.278. Section 25.103 of the Commission’s rules defines a “satellite system” to mean: “A space system using one or more artificial earth satellites;” and a “space system” to mean: “Any group of cooperating earth stations and/or space stations employing space radiocommunication for specific purposes.”

Intelsat's Application is silent as to this coordination obligation. Intelsat, moreover, has not initiated a Section 25.278 coordination with Iridium for Intelsat 33e. Given these circumstances, Iridium asks that any grant of Intelsat's Application include a condition putting Intelsat on notice of its obligation to coordinate with Iridium and requiring that such coordination be conducted.

Respectfully submitted,

**IRIDIUM SATELLITE LLC**

By: /s/ Joseph A. Godles

Joseph A. Godles  
GOLDBERG, GODLES, WIENER  
& WRIGHT LLP  
1229 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036

Its Attorneys

June 8, 2015

## CERTIFICATE OF SERVICE

I hereby certify that on this 8<sup>th</sup> day of June, 2015, a copy of the foregoing  
Comments of Iridium Satellite LLC was sent by first-class, United States mail to the  
following:

Susan H. Crandall  
Intelsat License LLC  
c/o Intelsat Corporation  
7900 Tysons One Place  
McLean, VA 22102

Jennifer D. Hindin  
Wiley Rein LLP  
1776 K Street, NW  
Washington State: DC 20006

/s/ Deborah Wiggins\_\_\_\_\_