

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Galaxy 14R,
a Replacement Satellite With New Frequencies, at 125.0° W.L.

File No.
SAT-LOA-20170524-00079

COMMENTS OF IRIDIUM SATELLITE LLC

Intelsat License, LLC (“Intelsat”) recently applied for authority to launch and operate Galaxy 14R, a new space station operating in the fixed-satellite service (“FSS”).¹ The Galaxy 14R would replace Intelsat’s existing Galaxy 14 satellite (call sign S2385), but operate in a number of new frequency bands, including the 29.25-30.0 GHz band. Significantly, the new frequencies requested by Intelsat overlap with the 29.25-29.3 GHz band, which Iridium Satellite LLC (“Iridium”) uses for feeder-link and telemetry, tracking, and control (“TT&C”) operations on a co-primary basis with the FSS. Iridium does not object to the grant of the Application, but requests that the Commission explicitly condition any authority to operate in the 29.25-29.3 GHz band on Intelsat’s successful coordination with Iridium.

¹ Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 14R, IBFS File No. SAT-LOA-20170524-00079 (filed May 24, 2017) (the “Application”).

BACKGROUND

Iridium provides global, reliable, and low-latency communications services using a large non-geostationary satellite orbit constellation operating in the mobile satellite service (“MSS”). Because of the unique capabilities of the Iridium network, commercial, military, and civilian government users depend on Iridium for mission-critical communications needs. In addition to supporting the missions of the Department of Defense, Iridium supports the core commercial operations of large and economically significant industrial sectors, and a diverse set of civilian public safety functions, including the efforts of our first responders.

Iridium is also in the process of launching its second-generation constellation, Iridium NEXT. Iridium has already placed twenty Iridium NEXT satellites into orbit, and is scheduled to launch an additional ten Iridium NEXT satellites on September 30, 2017. Backed by a \$3 billion investment, Iridium NEXT will be capable of supporting generational improvements in the delivery of mission-critical services that depend on satellite connectivity.

THE FCC SHOULD CONDITION ANY GRANT OF INTELSAT’S APPLICATION ON COORDINATION WITH IRIDIUM

In its Application, Intelsat generally accepts the placement of conditions on its authority to operate the Galaxy 14R in spectrum shared with or adjacent to other services. But Intelsat failed to mention the 29.25-29.3 GHz band in which Iridium’s gateway earth stations operate, and which is shared on a co-primary basis by NGSO MSS feeder links and GSO FSS systems. There is no reason why the Commission should treat the 29.25-29.3 GHz band any differently—and every reason why Intelsat’s use of the band also should be conditioned.

Every user communication on the Iridium satellite system is routed through a gateway earth station. Iridium also uses these frequencies for TT&C operations that control and command its space stations. Under the Commission’s rules, Intelsat must coordinate its

proposed use of the 29.25-29.3 GHz band for the Galaxy 14R with Iridium.² While Intelsat briefly acknowledges this coordination obligation in a footnote to its Engineering Statement, Intelsat does not meaningfully explain the facilities, operations, and services that it intends to deploy in the 29.25-29.3 GHz band,³ and did not provide any additional information when requested by Iridium. Intelsat's Application suggests that it may use the 29.25-29.3 GHz band for service links rather than feeder links, which could complicate its efforts to coordinate with Iridium, depending on the services that Intelsat ultimately seeks to deploy.⁴

In light of the Commission's requirements, an explicit condition on Intelsat's authorization is in order and would provide necessary assurances to existing operators like Iridium. Accordingly, the FCC should condition any authority permitting Intelsat to operate Galaxy 14R in the 29.25-29.3 GHz band on Intelsat's successful coordination with Iridium.

Respectfully submitted,



Scott Blake Harris
V. Shiva Goel
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street, NW, 8th Floor
Washington, DC 20036
(202) 730-1313

Maureen C. McLaughlin
Vice President, Public Policy
IRIDIUM SATELLITE LLC
1750 Tysons Boulevard, Suite 1400
McLean, VA 22102
(703) 287-7518

September 11, 2017

² See 47 C.F.R. § 25.278. See also *id.* § 25.258.

³ See Engineering Statement at 1 & n.2.

⁴ See Schedule S at Receiving Channels (43).

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2017, 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
7900 Tysons One Place
McLean, VA 22102

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

/s/ Elizabeth Marley