

Before the
Federal Communications Commission
Washington, DC 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. (Call Sign 3016)

File No. SAT-LOA-20170524-00079

INTELSAT LICENSE LLC RESPONSE TO COMMENTS

Intelsat License LLC (“Intelsat”) submits this response to the comments filed by Iridium Satellite LLC (“Iridium”) regarding Intelsat’s above-referenced application to launch and operate Galaxy 14R (Call Sign 3016), a replacement satellite with new frequencies to be operated at the 125.0° W.L. orbital location. In its comments, Iridium does not object to grant of Intelsat’s application, but requests that the Federal Communications Commission (“FCC” or “Commission”) “explicitly condition any authority to operate in the 29.25-29.3 GHz band on Intelsat’s successful coordination with Iridium”¹

The condition requested by Iridium is unnecessary. The Commission’s rules already require Intelsat to coordinate its use of the 29.25-29.3 GHz band with non-geostationary satellite orbit (“NGSO”) licensees’ feeder link operations. Rule 25.278 states:

Licensees of non-geostationary satellite systems that use frequency bands allocated to the Fixed-Satellite Service for their feeder link operations shall coordinate their operations with licensees of geostationary Fixed-Satellite Service systems licensed by the Commission for operation in the same frequency bands. Licensees

¹ Comments of Iridium, File No. SAT-LOA-20170524-00079, at 1 (filed Sept. 11, 2017).

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.²

And, rule 25.258 requires cooperation between the NGSO and GSO operators in such coordination:

Operators of NGSO MSS feeder link earth stations and GSO FSS earth stations in the band 29.25 to 29.5 GHz where both services have a co-primary allocation shall cooperate fully in order to coordinate their systems.³

In fact, Intelsat directly acknowledged the need for coordination in its Galaxy 14R application stating:

The band 29250-29300 MHz is allocated to MSS feederlinks and FSS on a co-primary basis. Earth station uplink operation in this band will require coordination with the incumbent MSS feeder link operator.⁴

Intelsat affirms herein that it will comply with the coordination obligations set forth in the Commission's rules related to use of the 29.25-29.3 GHz band. As such, the Commission should not impose the superfluous coordination condition requested by Iridium.

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

Susan H. Crandall
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Intelsat Corporation

² 47 C.F.R. § 25.278

³ 47 C.F.R. § 25.258.

⁴ 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. File No. SAT-LOA-20170524-00079, Engineering Statement at 1 & n.2 (May 24, 2017).

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2017, a copy of the foregoing Intelsat License LLC

Response to Comments was sent by first-class, United States mail to the following:

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