

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 15R,
a Replacement Satellite With New Frequencies, at 85.0° E.L.

File No.
SAT-LOA-20171027-00145

COMMENTS OF IRIDIUM SATELLITE LLC

INTRODUCTION

Intelsat License LLC (“Intelsat”) recently applied for authority to launch and operate Intelsat 15R, a geostationary orbit (“GSO”) space station in the fixed-satellite service (“FSS”) that would serve areas within ITU Regions 1 and 3 from 85 degrees east.¹ Among the frequencies proposed for the satellite are the 19.4-19.6 GHz and 29.1-29.3 GHz bands, which Iridium Satellite LLC (“Iridium”) uses on a co-primary basis for feeder links that support its non-geostationary orbit (“NGSO”) satellite constellation in the mobile-satellite service (“MSS”). *Intelsat proposes to use most of these frequencies pursuant to ITU filings made by Papua New Guinea, not by the United States*, but has not explained why the Commission should license the use of frequencies pursuant to Papua New Guinea filings. Moreover, as we have said before in similar contexts, the Commission’s rules require Intelsat to coordinate with Iridium prior to commencing operations in NGSO MSS feeder-link bands. Accordingly, the Commission should

¹ Intelsat License LLC, Application for Authority to Launch and Operate Intelsat 15R, a Replacement Satellite With New Frequencies, at 85.0° E.L., IBFS File No. SAT-LOA-20171027-00145 (filed Oct. 27, 2017) (the “Application”).

hold the Application in abeyance until Intelsat provides additional information that adequately addresses these matters. In addition, the Commission should adopt its standard condition requiring compliance with Sections 25.258 and 25.278 of the Commission's rules in the NGSO MSS feeder-link bands.

ARGUMENT

According to the Application, Intelsat 15R's proposed operation in a number of bands has been notified in ITU filings submitted by the United States.² Yet in the 19.4-19.6 GHz and 29.25-29.3 GHz bands (among others), Intelsat proposes to operate Intelsat 15R pursuant to ITU filings submitted by the administration of Papua New Guinea.³ Intelsat does not explain why it believes the FCC should license frequencies that would be notified by another administration, an act that the Commission's two-step process does not appear to contemplate.⁴ The Commission therefore should direct Intelsat to explain the basis for including this spectrum in its FCC application, and to identify the public interest benefits, if any, of the Commission granting a license for another administration's frequencies. The Commission likewise should direct Intelsat to identify the notifying administration for its proposed operations in the 29.1-29.25 GHz band, which was also not specified in the Application.

As it has done in the past, the Commission also should adopt its standard condition that Intelsat comply with Sections 25.258 and 25.278 of the Commission's rules in NGSO MSS

² Application at Engineering Statement p.6.

³ *Id.*

⁴ See *Comprehensive Review of Licensing & Operating Rules for Satellite Servs.*, Second Report and Order, 30 FCC Rcd. 14713, 14723 ¶ 23 (2015) (requiring GSO space station applicants to submit "a complete space station license application for operation using the orbital location, frequency bands, and polarization *proposed in the Coordination Request*" submitted by the Commission to the ITU).

feeder-link bands.⁵ Under Section 25.278, Intelsat must coordinate any use of “frequency bands . . . licensed to non-geostationary satellite systems for feeder link operations” with “the licensees of such non-geostationary satellite systems,” which, in the 19.4-19.6 GHz and 29.1-29.3 GHz bands, includes Iridium. Similarly, Section 25.258 requires Intelsat to coordinate its 29.25-29.3 GHz operations with Iridium.⁶ In the Application, Intelsat does not meaningfully describe the facilities, operations, or services that it plans to deploy in this spectrum, nor its approach to coordinating with Iridium. Iridium therefore believes the standard condition would be especially appropriate.

CONCLUSION

Given that Intelsat proposes to operate in the 19.4-19.6 GHz and 29.25-29.3 GHz bands pursuant to ITU filings of another administration, the Commission should require it to justify the need for including those frequencies in any grant of authority by the FCC. The Commission also should require Intelsat to identify the notifying administration for Intelsat 15R with respect to the 29.1-29.25 GHz band, which was not identified in the Application. Finally, Iridium requests that the Commission condition Intelsat’s license on compliance with 47 C.F.R. §§ 25.258 and 25.278.

⁵ See, e.g., Stamp Grant at 5, IBFS File No. SAT-LOA-20170524-00078 (May 10, 2018); Stamp Grant at 3, IBFS File No. SAT-LOA-20150327-00016 (Feb. 25, 2016).

⁶ Iridium notes that in the United States, Intelsat 15R would not be permitted to operate at all in the 19.4-19.6 GHz and 29.1-29.25 GHz bands pursuant to the Commission’s Ka-band plan. See 47 C.F.R. § 2.106 at NG166.

Respectfully submitted,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive style with a large, stylized 'S' at the beginning.

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2018, a copy of the foregoing Comments of Iridium Satellite LLC was sent by first-class, United States mail to the following:

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