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December 20, 2018

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

Re:

Intelsat License LLC, Surrender of Ka-band Frequencies

File No. SAT-LOA-20171027-00145

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), by counsel, hereby surrenders the Ka-band frequencies included in the authorization to launch and operate Intelsat 15R at the 85.0° E.L. orbital location (call sign S3022). Specifically, Intelsat surrenders the 17.3-17.8 GHz, 17.8-20.2 GHz, and 27.5-30.0 GHz bands and 20.180 GHz telemetry, tracking, and command ("TT&C") frequency (collectively, "Ka-band frequencies") due to a change in its business plans. Intelsat is retaining the remainder of the frequencies in the Intelsat 15R license – specifically, the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz, 12.5-12.75 GHz, and 13.75-14.5 GHz bands.

Intelsat respectfully requests that the Federal Communications Commission reissue the Intelsat 15R authorization without conditions 14-19, 21, 22, and 26, which pertain solely to the above surrendered Ka-band frequencies and without the Ka-band frequencies in the list of licensed frequencies and Conditions 13 and 20.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

Jennifer D. Hindin

Counsel to Intelsat License LLC

ce: Jose Albuquerque Stephen Duall Jay Whaley

Application of Intelsat License LLC 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, Stamp Grant (Dec. 4, 2018).

These Ka-band frequencies are not on the Intelsat 15 or Horizons 2 satellites, which Intelsat 15R will replace, and were therefore subject to a surety bond. *Id.* at condition 26. Intelsat is surrendering all frequencies subject to a bond.