

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
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Intelsat License LLC	)	
	)	
Application for Authority to Launch and	)	File No. SAT-LOA-_____
Operate SES-31 at 121.0° W.L.	)	
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	)	

**APPLICATION FOR AUTHORITY TO LAUNCH AND
OPERATE SES-31 AT 121.0° W.L.**

Intelsat License LLC (“Intelsat”) pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ applies to launch and operate a C-/Ku-band geostationary orbit (“GSO”) satellite, to be known as SES-31, at the 121.0° W.L. orbital location. SES-31 will be collocated with Galaxy 31 (S3076),² which is currently operating at the 121.0° W.L. orbital location.³

SES-31 is one of seven satellites Intelsat will launch to support the relocation of customers currently utilizing the 3980-4200 MHz frequency range (the “Upper C-band”),⁴ which is being repurposed for terrestrial wireless services pursuant to the Commission’s *Draft Upper C-band Order*.⁵ In order to maintain substantially the same service for these customers,

¹ 47 C.F.R. § 25.114.

² See *Application of Intelsat License LLC, as debtor-in-possession, to Launch and Operate Galaxy 31*, Stamp Grant, ICFS File No. SAT-RPL-20201109-00130 (granted June 17, 2021).

³ Intelsat will self-coordinate the operations of SES-31 and Galaxy 31.

⁴ Intelsat is a subsidiary of SES, S.A. Two satellites will be licensed by SES Americom, Inc. and the other five satellites will be licensed by Intelsat.

⁵ *Upper C-band (3.98-4.2 GHz); Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Draft Report and Order, Order of Proposed Modification, and Order on Reconsideration, GN Docket Nos. 18-122, 25-59, FCC-CIRC2607-01 (rel. Jul. 22, 2026) (“*Draft Upper C-band Order*”); see

Intelsat’s new satellites, including SES-31, will be capable of operating with C-band uplink frequencies cross-strapped to standard Ku-band downlink frequencies. SES-31 will also have two C-band-only transponders in the 40 megahertz of Upper C-band spectrum from 4160-4200 MHz that the Commission has retained for Fixed Satellite Service (“FSS”).

Grant of this application will serve the public interest by enabling Intelsat to ensure the provision of substantially the same service for C-band customers during and after the Upper C-band clearing contemplated by the *Draft Upper C-band Order*.⁶

I. INTELSAT IS QUALIFIED TO HOLD THE AUTHORIZATION REQUESTED HEREIN.

A. Legal Qualifications.

Intelsat is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat’s compliance with the Commission’s basic legal qualifications.⁷ In addition, Intelsat already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.⁸

also FCC, *FCC Adopts Plan for C-band Auction in July 2027*, Press Release (July 22, 2026), available at <https://www.fcc.gov/document/fcc-adopts-plan-c-band-auction-july-2027> (detailing plan to reallocate the 3980-4140 MHz portion of the Upper C-band for terrestrial flexible use services).

⁶ See generally *Draft Upper C-band Order*.

⁷ SES-31 will operate on a non-common carrier basis, like all other satellites licensed to Intelsat and its affiliates. As such, Section 310(b) is not applicable to this license. See *Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 n.5 (IB 2004).

⁸ *Applications of SES S.A. and Intelsat S.A.*, Memorandum Opinion and Order, SB Docket No. 24-267, 40 FCC Rcd 4919 ¶ 14 (2025) (affirming that SES has the requisite qualifications to hold FCC licenses).

B. Technical Qualifications.

As demonstrated in the attached Form 312, Schedule S, and Technical Appendix, Intelsat is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information required by Section 25.114 of the Commission's rules.⁹ In addition, Intelsat's Technical Appendix provides information on compliance with the Commission's orbital debris mitigation rules.

II. OPERATIONAL FREQUENCIES.

The following chart lists the frequencies planned for use with SES-31 at 121.0° W.L.:

Frequencies	4160-4200 MHz (space-to-Earth) 5885-6425 MHz (Earth-to-space) 11.7-12.2 GHz (space-to-Earth) 14.0-14.5 GHz (Earth-to-space) Telemetry, Tracking, and Command ("TT&C") center frequencies: 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) ¹⁰
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From the 121.0° W.L. orbital location, SES-31 will provide C- and Ku-band services to the United States and nearby territories, as described in the accompanying Technical Appendix and Schedule S.

Intelsat expects that most of the transponders on SES-31 will be configured with the C-band uplink frequencies cross-strapped to the Ku-band downlink frequencies in order to accommodate Upper C-band customers migrating into Ku-band. However, these transponders can also be configured to operate with Ku-band-only uplink and downlink frequencies. The satellite will also have two C-band-only transponders with C-band uplink frequencies paired to the downlink frequencies in the remaining 40 megahertz of Upper C-band downlink spectrum

⁹ 47 C.F.R. § 25.114.

¹⁰ SES-31 will be equipped with tunable TT&C by which center frequencies are selectable via ground command in 100 kHz steps. See Technical Appendix at § 2.

retained for the FSS by the Commission. These C-band-only transponders will ensure that Intelsat can maximize its use of the remaining portion of the C-band allocated for the FSS, primarily to accommodate Upper C-band customers that must remain in C-band.

III. REQUEST FOR WAIVERS.

To the extent necessary, Intelsat requests waivers of (a) the freeze on new space station applications to provide FSS in the 3700-4200 MHz;¹¹ (b) footnote US245 of the Table of Allocations and Section 2.108 of the Commission's rules;¹² (c) Sections 25.114(d)(14)(ii) and 25.114(d)(14)(vii)(1) of the Commission's orbital debris rules;¹³ and (d) the Commission's surety bond requirement.¹⁴

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."¹⁵ Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.¹⁶ In determining whether a waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."¹⁷ The Commission may also grant a waiver request where the unique or unusual factual

¹¹ *International Bureau Announces Temporary Filing Freeze on New Fixed-Satellite Service Space Station Applications in the 3.7-4.2 GHz Band*, Public Notice, DA 18-640, 33 FCC Rcd 6119 (Jun. 21, 2018) ("*C-band Filing Freeze*"); 47 C.F.R. § 2.106 n. NG182.

¹² 47 C.F.R. § 2.106 n. US245; *id.* § 2.108.

¹³ *Id.* §§ 25.114(d)(14)(ii), (vii)(1).

¹⁴ *Id.* §§ 25.164-165.

¹⁵ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹⁶ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁷ *WAIT Radio*, 418 F.2d at 1159.

circumstances of a case would make application of the rule inequitable, unduly burdensome, or contrary to the public interest.¹⁸

A. C-band Application Freeze.

The Commission currently has a freeze on all new space station applications in 3700-4200 MHz (“*C-band Filing Freeze*”),¹⁹ which remains in place to “maintain a stable spectrum environment.”²⁰ Good cause exists to waive the *C-band Filing Freeze*. The instant application is in service of the Upper C-band transition contemplated by the Commission’s *Draft Upper C-band Order* and the Commission foresaw the necessity of waiver of the *C-band Filing Freeze* in such cases.²¹ Further, grant of the requested waiver will allow Intelsat to maintain substantially the same service for C-band FSS customers as part of the Upper C-band transition contemplated by the Commission’s *Draft Upper C-band Order*.

B. Footnote US245 of the U.S. Table of Allocations and Section 2.108 of the Commission’s Rules.

Footnote US245 of the Table of Allocations and Section 2.108 of the Commission’s rules limit FSS use of the 5850-5925 MHz band (Earth-to-space) to international inter-continental systems.²² Intelsat seeks to operate SES-31 in the 5885-5925 MHz portion of this band domestically on a protected basis with a small number of U.S. gateway earth stations.

Good cause exists to waive footnote US245 of the Table of Allocations and Section 2.108 of the Commission’s rules to allow SES-31 to use the 5885-6425 MHz band for domestic traffic on a protected basis. The purpose of footnote US245 and Section 2.108 is to ensure and limit

¹⁸ 47 C.F.R. § 1.925(3)(ii).

¹⁹ *C-band Filing Freeze*; 47 C.F.R. § 2.106 n. NG182.

²⁰ *Draft Upper C-band Order* ¶ 91 n. 304.

²¹ *Id.*

²² 47 C.F.R. § 2.106, n. US245; *id.* at § 2.108.

coordination of FSS operations with co-primary government stations in the band.²³ For purposes of the Upper C-band transition, Intelsat intends to operate in the 5885-6425 MHz band using a small number of satellite gateway earth stations that are or will be authorized by the Commission to uplink in this band in accordance with its rules, following coordination with Federal users through the National Telecommunications and Information Administration.

As a result, the additional coordination burden on Federal users will be minimal (or non-existent in the case of earth stations already licensed to operate in this band). The Commission has previously waived US245 where an operator has demonstrated that “there is minimal potential for interference with federal fixed and mobile terrestrial systems[.]”²⁴ In analogous circumstances, waivers have also been granted of the international-only restriction in footnote NG52 (previously NG104) of the U.S. Table of Allocations to allow protected operations with a small number of gateway earth stations.²⁵

In this case, because Intelsat plans to only use a limited number of licensed gateways earth stations in 5885-5925 MHz, grant of the waiver requested would not undermine the policy goals underlying the restrictions imposed by US245 and would be consistent with Commission precedent. Furthermore, allowing the requested domestic use on a protected basis would ensure

²³ *Astrolink International LLC, Application to Modify System Authorization*, Order and Authorization, 15 FCC Rcd 23738 ¶ 7 (IB 2000) (“[T]he intent of [US245] is to insure [sic] coordination with government stations...”).

²⁴ See *Eutelsat do Brasil LTDA, Request for U.S. Market Access for Eutelsat 65WA (S3226)*, Stamp Grant, ICFS File No. SAT-PPL-20250326-00079 ¶ 5 (granted July 10, 2025).

²⁵ See *Mobile Satellite Ventures Subsidiary LLC*, DA 05-1492, Order and Authorization, ICFS File No. SAT-LOA-19980702-00066 ¶ 39 (IB 2005) (“In granting these waivers, the Commission said that allowing small numbers of gateway earth stations to operate in this portion of the Ku-band should not increase the frequency coordination burden on terrestrial wireless services significantly more than the burden imposed by existing permitted use of those bands by international systems.”)

that Intelsat is able to provide “substantially the same” or “essentially the same” service to its customers during and after the Upper C-band transition, as required by the *Draft Upper C-band Order*.²⁶

Grant of the requested waiver would also serve the public interest. Intelsat is launching SES-31 in order to maintain substantially the same service for C-band FSS customers as part of the Upper C-band transition contemplated by the Commission’s *Draft Upper C-band Order*. Intelsat will be accommodating these customers in major part by transitioning domestic C-band media distribution customers to new cross-strapped C-band uplink / Ku-band downlink transponders on new satellites. Such media distribution customers typically require only a small number of gateway earth stations for their uplinks. Grant of the requested waiver would therefore support Intelsat’s transition plan for domestic Upper C-band customers by enabling such customers to uplink in this band.

C. Sections 25.114(d)(14)(ii) and 25.114(d)(14)(vii)(1).

Sections 25.114(d)(14)(ii) and 25.114(d)(14)(vii)(1) require applicants to provide a statement that indicates whether the probability for an individual space station to become a source of debris by collision with small objects is 0.01 or less and the intended disposal altitude for the satellite complete with supporting calculations, respectively.

Good cause exists to waive Sections 25.114(d)(14)(ii) and 25.114(d)(14)(vii)(1) based on hardship. Intelsat is still working with the manufacturer to complete the design of SES-31. At this time it is impossible for Intelsat to calculate SES-31’s small-object collision probability or target disposal height without inputs that will not be available until after the satellite design is finalized. Intelsat will supplement this application to comply with Sections 25.114(d)(14)(ii) and

²⁶ *Draft Upper C-band Order* ¶ 104.

25.114(d)(14)(vii)(1) once the necessary information for the underlying calculations is available. Further, grant of this waiver is also in the public interest as it will advance the Commission's goal of expeditiously relocating of customers currently utilizing the Upper C-band frequencies.

D. Surety Bond

Good cause also exists to waive the surety bond, to the extent necessary. The Commission recently adopted new satellite rules in its *Space Modernization Order*, which includes the deletion of the GSO surety bond obligation.²⁷ If grant of this application occurs prior to the 'Part 100 Effective Date' for the GSO surety bond relief slated by the *Space Modernization Order*,²⁸ then SES-31 will be subject to the milestone and bond requirements currently set forth in Sections 25.164 and 25.165 of the Commission's rules.²⁹ In this case, given the impending removal of the Commission's surety bond requirement for GSO satellites, it would be an undue hardship to require Intelsat to spend resources to obtain surety bonds for a short, indeterminant time while the relevant rule change comes into effect. Intelsat notes that the Commission has already deferred the bond requirement for other GSO licensees pending Commission action in the *Space Modernization* proceeding.³⁰ Application of the rule here also

²⁷ See *Space Modernization for the 21st Century*, Draft Report and Order and Further Notice of Proposed Rulemaking, SB Docket No. 25-306, FCC-CIRC2607-02 ¶ 248 (rel. Jul. 1, 2026).

²⁸ See *id.* ¶ 319. The 'Part 100 Effective Date' will relieve existing GSO bond holders of their previous bond obligations. *Id.* ¶ 326.

²⁹ 47 C.F.R. §§ 25.164 and 25.165.

³⁰ See *Astranis Projects USA LLC, Application to Launch and Operate Astranis 131W (S00784)*, Stamp Grant, ICFS File No. SAT-LOA-20260112-0024, Condition 13 (granted May 6, 2026) (granting 180-day deferral of Commission's bond requirements, noting that deferral of the bond requirement would not undermine the policy objectives of the surety bond requirement considering Astranis' upcoming launch date and the pending *Space Modernization* proceeding proposing to eliminate the surety bond requirement for GSO satellites); *Astranis Projects USA LLC, Application to Launch and Operate ASTRANIS 157E (S3226)*, Stamp Grant, ICFS File Nos. SAT-LOA-20250618-00152; SAT-AMD-20250919-00292, Condition 13 (granted April 23, 2026) (same).

would not be in the public interest as the Commission has already determined GSO surety bonds are not necessary.

IV. INTERNATIONAL TELECOMMUNICATION UNION COST RECOVERY.

Intelsat is aware that processing fees are currently charged by the International Telecommunication Union (“ITU”) for satellite filings, and that Commission applicants are responsible for any and all fees charged by the ITU.³¹ Intelsat unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of Intelsat for the satellite proposed in this application, as well as any ITU filings associated with any satellite system for which Intelsat may request authorization at a later date.

V. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST.

Grant of the requested authorization and associated waiver requests will serve the public interest by enabling Intelsat to continue providing substantially the same level of service to its C-band customers during and after the Upper C-band transition. Moreover, SES-31 will facilitate the Upper C-band transition—and the significant public interest benefits the Commission has found the transition will create³²—by allowing Intelsat’s customers to continue using most of their existing C-band uplink infrastructure and minimizing disruption to existing services during and after the transition.

³¹ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

³² See *Draft Upper C-band Order* ¶ 20 (reallocating Upper C-band spectrum for terrestrial flexible use will “lead to substantial economic gains,” advance the Commission’s policy goals, and serve the public interest).

VI. CONCLUSION.

In light of the foregoing, Intelsat respectfully requests that the Commission grant the authorization requested herein.

Respectfully submitted,

Intelsat License LLC

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