

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Intelsat New Dawn Company, Ltd.

Application to Modify Authorization for  
New Dawn (S2751)

File No. SAT-MOD- \_\_\_\_\_

**APPLICATION OF INTELSAT NEW DAWN COMPANY, LTD.**  
**TO MODIFY AUTHORIZATION FOR NEW DAWN**

Intelsat New Dawn Company, Ltd. (“Intelsat New Dawn”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”), 47 C.F.R. § 25.117, hereby seeks to modify its authorization for the New Dawn satellite (call sign S2751). Specifically, this modification requests Commission approval for several technical changes to the New Dawn satellite’s design. The New Dawn satellite is scheduled for launch in March 2011 and will operate at the 32.8° E.L. orbital location.

In accordance with the requirements of the Commission’s rules,<sup>1</sup> this application has been filed electronically as an attachment to FCC Form 312. Intelsat New Dawn provides the technical information relating to the proposed modification on Schedule S and in narrative form, as contained in the attached revised Engineering Statement, pursuant to Section 25.114 of the Commission’s rules.<sup>2</sup> For the Commission’s convenience, Intelsat New Dawn is also attaching a table summarizing the technical changes as Exhibit D hereto.

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<sup>1</sup> 47 C.F.R. § 25.117(c).

<sup>2</sup> 47 C.F.R. § 25.114.

## **I. PROPOSED MODIFICATION**

By this modification application, Intelsat New Dawn requests authority to launch and operate the New Dawn satellite with an updated technical design. The FCC authorized Intelsat New Dawn to launch and operate the New Dawn space station at 32.8° E.L. in January 2009.<sup>3</sup> More recently, the Commission determined that Intelsat New Dawn had met the first three milestones – Contract Execution, Critical Design Review, and Construction Commencement – for the New Dawn satellite.<sup>4</sup> As development and construction of the satellite has progressed, Intelsat New Dawn has decided to revise certain technical elements of the satellite’s design. These revisions include removal of the 6500-6550 MHz frequency band; addition of one global horn antenna; adjustment of command and telemetry frequencies, G/T and EIRP values; changes to the communications channels in the C- and Ku-band; and updated values in the Engineering Statement exhibits. Each of these changes is highlighted in the attached table and explained fully in the attached Engineering Statement. Even with these changes, Intelsat New Dawn anticipates completion of construction and launch of the New Dawn satellite in March 2011, a date far in advance of the launch milestone of January 9, 2014.

## **II. PUBLIC INTEREST SHOWING**

Grant of this modification application will serve the public interest. Overall, the revised design of the New Dawn satellite is better tailored to meet the needs of customers in the Middle East/Africa region. Moreover, as modified, the New Dawn satellite will still ensure continuity of service to customers at the 32.8° E.L. orbital location. As noted previously, Intelsat New

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<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00574, File Nos. SAT-LOA-20080509-00101, SAT-AMD-20081205-00223 (Jan. 16, 2009) (Public Notice).

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00720, File No. SAT-LOI-20080107-0006 (Sept. 10, 2010) (Public Notice).

Dawn will replace the Galaxy 11 satellite, which is currently operating at 32.8° E.L.<sup>5</sup> In addition, Intelsat New Dawn will operate New Dawn at 32.8° E.L. in accordance with Intelsat's existing coordination agreements regarding the nominal 33° E.L. location and the FCC's rules governing operations vis-à-vis adjacent locations. Notably, Intelsat New Dawn is not seeking to add new frequencies to the New Dawn satellite. Instead, Intelsat New Dawn has removed the 6500-6550 MHz frequency band that was included in the initial grant, thus further facilitating coordination.

### **III. TECHNICAL WAIVERS**

As described in the attached Engineering Statement, Intelsat New Dawn requests that two of the four Part 25 waivers originally granted to the New Dawn spacecraft continue to apply. Specifically, Intelsat New Dawn seeks to preserve the waivers of Sections 25.202(g) and 25.114(d)(3) of the Commission's rules.<sup>6</sup> Intelsat New Dawn's prior requests for these two waivers are incorporated herein by reference.<sup>7</sup>

Intelsat New Dawn no longer seeks waivers of Sections 25.210(a)(1) and 25.210(a)(3) of the Commission's rules<sup>8</sup> because they are not necessary. The requirement of Section 25.210(a)(1) that C-band satellites employ orthogonal linear polarization on a transponder basis and the requirement of Section 25.210(a)(3) that C-band space stations be capable of switching

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<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00541, File No. SAT-MOD-20080225-00051 (July 25, 2008) (Public Notice). Intelsat New Dawn's sister company, PanAmSat Licensee Corp. ("PanAmSat"), will soon file an application to relocate the Galaxy 11 satellite to 304.5° E.L.

<sup>6</sup> See *Intelsat New Dawn Company, Ltd. Application for Authority to Launch and Operate a Replacement Satellite at 32.8° E.L.*, File No. SAT-LOA-20080509-00101 (filed May 9, 2008); *Intelsat New Dawn Company, Ltd. Application to Amend Pending Application for Authority to Launch and Operate a Replacement Satellite at 32.8° E.L.*, File No. SAT-AMD-20081205-00223 (filed Dec. 5, 2008) (stamp granted with conditions Jan. 9, 2009).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

polarization sense upon ground command do not apply to the New Dawn satellite because the satellite will not be providing domestic service.

**IV. CONCLUSION**

For the reasons set forth above, Intelsat New Dawn respectfully requests that the Commission grant this modification application.

Respectfully submitted,

Intelsat New Dawn Company, Ltd.

By: /s/ Susan H. Crandall

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**Exhibit A**  
**FCC Form 312, Response to Question 34: Foreign Ownership**

The Commission previously approved the foreign ownership in Intelsat. *See Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”). In December 2009, the Commission also approved certain pro forma changes in Intelsat’s foreign ownership. There have been no other material changes to the foreign ownership since the date of the *Intelsat-Serafina Order*.

**Exhibit B**  
**FCC Form 312, Response to Question 36: Cancelled Authorizations**

Intelsat New Dawn Company, Ltd. (“Intelsat New Dawn”) has never had an FCC license “revoked.”

However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat Licensee Corp. (“PanAmSat”), a sister company of Intelsat New Dawn, based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones. *See* PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000). In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by Question 36, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on either PanAmSat’s or Intelsat New Dawn’s basic qualifications, which are well-established and a matter of public record.

**Exhibit C**  
**FCC Form 312, Response to Question 40:**  
**Officers, Directors, and Ten Percent or Greater Shareholders**

Following are the officers of Intelsat New Dawn Company, Ltd.:

Andrew Stimson, Chairman and Chief Executive Officer and Resident Representative  
Phillip Spector, Deputy Chairman and Assistant Secretary  
Simon Van De Weg, Secretary

Following are the directors of Intelsat New Dawn Company, Ltd.:

Michael McDonnell  
Andrew Stimson  
Phillip Spector  
Simon Van De Weg

The address of all Intelsat New Dawn Company, Ltd. officers and directors is:

4 rue Albert Borschette  
L-1246 Luxembourg

Intelsat New Dawn Company, Ltd. is a Bermuda company that is wholly owned by Intelsat New Dawn (Gibraltar) Limited, a Gibraltar company. Intelsat New Dawn (Gibraltar) Limited is wholly owned by Intelsat Subsidiary Holding Company S.A., a Luxembourg company. Intelsat Subsidiary Holding Company S.A. is wholly owned by Intelsat Intermediate Holding Company S.A., a Luxembourg company. Intelsat Intermediate Holding Company S.A. is wholly owned by Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat S.A., a Luxembourg company. Intelsat S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Global Subsidiary S.A., a Luxembourg company. Intelsat Global Subsidiary S.A. is wholly owned by Intelsat Global S.A., a Luxembourg company (“Intelsat Global”, formerly “Serafina Holdings Limited”). Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”).

**Exhibit D**  
**Table Summarizing Main Changes to New Dawn Design**

<b>Topic</b>	<b>Comments</b>
Frequency Bands	<ul style="list-style-type: none"> <li>• The frequency band 6500-6550 MHz included in the initial grant has been removed</li> <li>• All other frequency bands remain unchanged</li> </ul>
Coverage Areas	<ul style="list-style-type: none"> <li>• Unchanged</li> </ul>
Antenna Patterns	<ul style="list-style-type: none"> <li>• All antenna patterns have been updated</li> </ul>
Telemetry, Command & Ranging Antennas	<ul style="list-style-type: none"> <li>• One global horn antenna has been added</li> <li>• Polarizations have been updated, see section 2.7)</li> <li>• New Exhibits 8 and 9 have been updated</li> </ul>
Spacecraft Characteristics	<ul style="list-style-type: none"> <li>• Several of the parameter values contained in new Exhibit 2 have been updated</li> <li>• In particular, command and telemetry frequencies, G/T and EIRP values have been slightly adjusted</li> </ul>
Communication Channels	<ul style="list-style-type: none"> <li>• In C-band there are now fourteen 72 MHz channels instead of thirteen 72 MHz and two 36 MHz channels</li> <li>• In Ku-band there are now eight 72 MHz and eight 36 MHz channels instead of twenty-four 36 MHz channels</li> </ul>
Mass Budget	<ul style="list-style-type: none"> <li>• Values in new Exhibit 3 have been updated</li> </ul>
Power Budget	<ul style="list-style-type: none"> <li>• Values in new Exhibit 4 have been updated</li> </ul>
Intelsat 802	<ul style="list-style-type: none"> <li>• References to Intelsat 802 have been removed since this satellite has been de-orbited.</li> </ul>
Attenuator Settings	<ul style="list-style-type: none"> <li>• Attenuator ranges in section 2.6.2) have been updated</li> </ul>
EIRP and G/T Budgets	<ul style="list-style-type: none"> <li>• Values in new Exhibit 7 have been updated</li> </ul>
Transponder Descriptions	<ul style="list-style-type: none"> <li>• The C-band and Ku-band transponder descriptions in section 2.6.3) have been updated</li> </ul>
ULPC	<ul style="list-style-type: none"> <li>• Information in section 2.8) has been updated.</li> </ul>
Channel Filters	<ul style="list-style-type: none"> <li>• Frequency responses in new Exhibit 10 have been updated</li> </ul>