S2469

SAT-MOD-20110420-00073

IB2011001169

Intelsat License LLC GALAXY 26

Date & Time Filed: Apr 20 2011 5:34:21:306PM

File Number: SAT-MOD-20110420-00073



File # SAT-MOD-20110420-00073

Call Sign 52469 Grant Date 03/02/12

(or other identifier)

Term Dates See

Approved by OMB 3060-0678

From 03/02/12

To: conditions

Stephen J. Duall

Chief, Satellite Policy Branch

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD - MAIN FORM

FCC 312 MAIN FORM FOR OFFICIAL USE ONLY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu: Modification Application to Relocate Galaxy 26 (S2469) to 50.0 E.L.

1-8. Legal Name of Applicant

Name:

Intelsat License LLC

Phone Number:

202-944-7848

DBA

Fax Number:

202-944-7870

Name: Street:

c/o Intelsat Corporation

E-Mail:

susan.crandall@intelsat.com

-3006

3400 International Drive, N.W.

City:

Washington

State:

DC

Country:

USA

Zipcode:

20008

Attention:

Susan H Crandall

Attachment to Grant Intelsat License LLC IBFS File No. SAT-MOD-20110420-00073 Call Sign S2469

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT–MOD–20110420–00073, as supplemented, to modify the authorization for its Galaxy 26 space station in order to specify operations of Galaxy 26 at the 50.0° E.L. orbital location, instead of its currently authorized orbital location of 50.75° E.L., is GRANTED. Accordingly, Intelsat is authorized to provide fixed-satellite services in the 11.7–12.2 GHz (space-to-Earth) and 14.0–14.5 GHz (Earth-to-space) frequency bands at the 50.0° E.L. orbital location. Additionally, Intelsat is authorized to conduct telemetry, tracking, and telecommand operations with the Galaxy 26 space station using the following frequencies: 4196.5 MHz (vertical polarization/space-to-Earth) or 4199.5 MHz (vertical polarization/space-to-Earth); 6315.0 MHz (vertical polarization/Earth-to-space) and 4090.0 MHz (horizontal polarization/space-to-Earth); 5926.5 MHz (right-hand circular polarization/Earth-to-space), and 6411.0 MHz (right-hand circular polarization/Earth-to-space). These operations are authorized in accordance with the technical specifications set forth in Intelsat's application, the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

- 1. All operations shall be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
- 2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
- 3. While at the 50.0° E.L. orbital location, Intelsat shall maintain the Galaxy 26 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
- 4. Intelsat's request for continued waiver of Section 25.202(g) of the Commission's rules, 47 C.F.R. 25.202(g) is GRANTED, as conditioned. Section 25.202(g) requires that "telemetry, tracking and telecommand (TT&C) functions for U.S. domestic satellites shall be conducted at either or both edges of the allocated band(s). Frequencies, polarization, and coding

¹ The application, IBFS File No. SAT-MOD-20110420-00073 was placed on Public Notice on May 6, 2011. See Policy Branch Information, Satellite Space Station Applications Accepted for Filing, Public Notice, Report No. SAT-00775 (rel. May 6, 2011). In response to the Public Notice, comments were filed by Al Yah Satellite Communications Company PrJSC (Yahsat). In its comments, Yahsat expressed concern that operations of Galaxy 26 at the 50.0° E.L. orbital location in the 11.7-12.2 GHz frequency band (space-to-Earth) could result in harmful interference to space stations operating in the Broadcasting-Satellite Service at nearby orbital locations. Subsequently, Yahsat and Intelsat reached an arrangement with respect to the operations of Galaxy 26 at 50.0° E.L. in the 11.7-12.2 GHz frequency band. See Letter from Kalpak Gude, Intelsat, and Hazem Moakkit, Yahsat, to Marlene H. Dortch, FCC, dated Feb. 24, 2012 ("Feb. 24 Letter"). Accordingly, Yahsat and Intelsat request grant of Intelsat's application, subject to Intelsat's operations consistent with the terms of the arrangement. Id.

² Intelsat states that it will not use the communications payload of Galaxy 26 in the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency bands, except for telemetry, tracking, and telecommand (TT&C). Accordingly, no authority to provide communications in these frequency bands is granted, except for TT&C, as specified herein.

Attachment to Grant Intelsat License LLC IBFS File No. SAT-MOD-20110420-00073 Call Sign S2469

shall be selected to minimize interference into other satellite networks and within their own satellite system." Intelsat seeks a waiver of this rule to operate Galaxy 26's back-up command uplink at 6411 MHz, its ranging uplink at 6315 MHz, and its ranging downlink at 4090 MHz - none of which are at the band edges - for regular on-station TT&C communications at the 50.0° E.L. orbital location. This waiver grant is based upon the following findings:

- (a) Due to health issues with Galaxy 26, Intelsat can only operate the space station's back-up command uplink, ranging uplink, and ranging downlink at the aforementioned frequencies;
- (b) Intelsat needs to operate command and ranging with Galaxy 26 in order to insure safe operation of the space station;
- (c) Intelsat will coordinate operations of Galaxy 26 with other space stations to avoid interference, and will operate Galaxy 26 on a non-interference basis.

As a condition of the grant of this waiver, Intelsat shall coordinate TT&C operations of Galaxy 26 at the 50.0° E.L. orbital location with all potentially affected operators of other radiocommunication systems. In the absence of a coordination agreement regarding these TT&C operations, Intelsat's TT&C operations shall be on a non-harmful interference basis (*i.e.*, Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radiocommunication system). Additionally, Intelsat must accommodate future space station networks that are compliant with Section 25.202(g) of the Commission's rules.

- 5. This authorization is issued on the understanding that this grant is not an approval of any specific agreement entered into by Intelsat, its subsidiaries, and affiliates, with the Turksat Satellite Communication Cable TV and Operation, Inc. (Turksat AS), nor of any specific provision of any such agreement, concerning operation of the Galaxy 26 space station, nor is it an approval of an agreement concerning any related matter, nor of any specific provision of any such agreement concerning any related matter.
- 6. This authorization is issued on the understanding that this grant does not in any way express a view concerning, or agreement as to, the validity or lack of validity of any ITU filing at or within the vicinity of the 50.0° E.L. orbital location.
- 7. This authorization is also issued on the understanding that the United States remains the licensing administration, for purposes of ITU Radio Regulation 18.1, for the Galaxy 26 space station, and that its operations at 50.0° E.L. are pursuant to ITU Radio Regulation 4.4.
- 8. Intelsat is authorized to operate the communications payload of the Galaxy 26 satellite at the 50.0° E.L orbital location in the 11.7-12.2 GHz (space-to-Earth) frequency band consistent with the terms of its arrangement with Yahsat, which expires December 31, 2013.³ After this date, Intelsat must either seek authority from the Commission to extend the term of

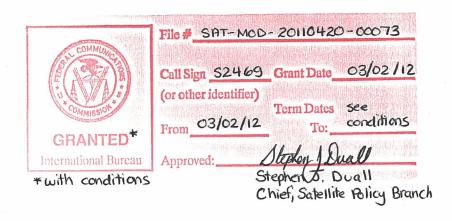
-

³ Feb. 24 Letter at 1.

Attachment to Grant Intelsat License LLC IBFS File No. SAT-MOD-20110420-00073 Call Sign S2469

this authorization or cease operating the communications payload of Galaxy 26 in the 11.7-12.2 GHz (space-to-Earth) frequency band at the 50.0° E.L orbital location.

- 9. Nothing in this authorization extends the license term for Galaxy 26 (Call Sign S2469), which expires on March 15, 2014. *See* IBFS File No. SAT-MOD-2009309-00034.
- 10. Grant of this authorization does not convey to Intelsat any authority to operate a space station at the 50.0° E.L. orbital location beyond the term granted herein, nor any status in the United States satellite licensing process relative to applications for authority to operate a regularly authorized satellite at this orbital position.
- 11. Intelsat is afforded 30 days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
- 12. These actions are issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and are effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.



9-16. Name of Contact Representative

Name:

Jennifer D. Hindin

Phone Number:

202-719-4975

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USA

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20006-3006

Attention:

Jennifer D. Hindin

Relationship:

Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

o al. Earth Station

a2. Space Station

(N/A) b1. Application for License of New Station

(N/A) b2. Application for Registration of New Domestic Receive-Only Station

o b3. Amendment to a Pending Application

b4. Modification of License or Registration

b5. Assignment of License or Registration

b6. Transfer of Control of License or Registration

o b7. Notification of Minor Modification

(N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite

(N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States

(N/A) b10. Other (Please specify)

(N/A) b11. Application for Earth Station to Access a Non–U.S.satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States

(N/A) b12. Application for Database Entry

6 b13. Amendment to a Pending Database Entry Application

o b14. Modification of Database Entry

17c. Is a fee submitted with this applica If Yes, complete and attach FCC Form Governmental Entity Noncomm	n 159. If No, indicate reason for fee exemptio	n (see 47 C.F.R.Section 1.1114).	
Other(please explain):			
17d.			
Fee Classification BFY - Space Station	Modification(Geostationary)		
18. If this filing is in reference to an existing station, enter:	19. If this filing is an amendment to a pendir modification please enter only the file number	ng application enter both fields, if this filing is a er:	
(a) Call sign of station: S2469	(a) Date pending application was filed:	(b) File number:	
52707		SATMOD2009030900034	

TYPE OF SERVICE

P	
20. NATURE OF SERVICE: This filing is for an authorization to provid	e or use the following type(s) of service(s): Select all that apply:
a. Fixed Satellite	
b. Mobile Satellite	
c. Radiodetermination Satellite	
d. Earth Exploration Satellite	
e. Direct to Home Fixed Satellite	
f. Digital Audio Radio Service	
g. Other (please specify)	
21. STATUS: Choose the button next to the applicable status. Choose	22. If earth station applicant, check all that apply.
only one.	Using U.S. licensed satellites
O Common Carrier Non-Common Carrier	Using Non–U.S. licensed satellites
23. If applicant is providing INTERNATIONAL COMMON CARRIER s facilities:	ervice, see instructions regarding Sec. 214 filings. Choose one. Are these
O Connected to a Public Switched Network Not connected to a	Public Switched Network N/A
24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all a	pplicable frequency band(s).
a. C-Band (4/6 GHz) b. Ku-Band (12/14 GHz)	
c.Other (Please specify upper and lower frequencies in MHz.)	
Frequency Lower: Frequency Upper: (Please specify addition	nal frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.
o a. Fixed Earth Station
b. Temporary–Fixed Earth Station
c. 12/14 GHz VSAT Network
d. Mobile Earth Station
e. Geostationary Space Station
f. Non-Geostationary Space Station
g. Other (please specify)
26. TYPE OF EARTH STATION FACILITY:
Transmit/Receive Transmit-Only Receive-Only N/A
"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)
a — authorization to add new emission designator and related service
b — authorization to change emission designator and related service
c — authorization to increase EIRP and EIRP density
d — authorization to replace antenna
e — authorization to add antenna
f — authorization to relocate fixed station
g — authorization to change frequency(ies)
h — authorization to add frequency
i — authorization to add Points of Communication (satellites & Double
j — authorization to change Points of Communication (satellites & amp; countries)
k — authorization for facilities for which environmental assessment and
radiation hazard reporting is required
1 — authorization to change orbit location
m — authorization to perform fleet management
n — authorization to extend milestones
o — Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.	0	Yes	•	No		
ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aerona aeronautical fixed radio station services are not required to respond to Items 30–34.	autic	al en	rou	te or		
29. Is the applicant a foreign government or the representative of any foreign government?	0	Yes	•	No		
30. Is the applicant an alien or the representative of an alien?	0	Yes	•	No	0	N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	0	Yes	•	No	0	N/A
32. Is the applicant a corporation of which more than one—fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	٥	Yes	0	No	0	N/A

● Yes ○	No 👩 N/A
Yes	O No
EngineeringSt	atement
Yes	O No
	Yes EngineeringSt

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explination of circumstances.	O Yes	⊚ No
38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances	○ Yes	⊚ No
39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhinit, an explanation of the circumstances.	O Yes	⊚ No
40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.		

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	Yes	O No
42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.	O Yes	⊚ No
42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, we coordinated or is in the process of coordinating the space station?	hat administr	ration has

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC, pursuant to Section 25.117 of the rules of the Federal Communications Commission, hereby seeks to modify the authorization for the Galaxy 26 satellite (call sign S2469). Specifically, this modification seeks authority to relocate Galaxy 26 to, and operate the satellite at, the 50.0 E.L. orbital location in the Ku-band

Narrative & Exhibits

43a. Geographic Service Rule Certification By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.	⊗ A
By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.	O B
By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.	o c

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

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FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060–0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060–0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

43. Description. (Summarize the nature of the application and the services to be provided).

Intelsat License LLC, pursuant to Section 25.117 of the rules of the Federal Communications Commission, hereby seeks to modify the authorization for the Galaxy 26 satellite (call sign S2469). Specifically, this modification seeks authority to relocate Galaxy 26 to, and operate the satellite at, the 50.0 E.L. orbital location in the Ku-band and portions of the C-band pursuant to the ITU filings of the Turkish Administration for that location.

Before the Federal Communications Commission Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization to Relocate Galaxy 26 to 50.0° E.L.

File No. SAT-MOD-2011

Call Sign: S2469

APPLICATION OF INTELSAT LICENSE LLC TO MODIFY AUTHORIZATION FOR GALAXY 26

Intelsat License LLC ("Intelsat"), pursuant to Section 25.117 of the rules of the Federal Communications Commission ("Commission" or "FCC"), hereby seeks to modify the authorization for the Galaxy 26 satellite (call sign S2469). Specifically, this modification seeks authority to relocate Galaxy 26 to, and operate the satellite at, the 50.0° E.L. orbital location in the Ku-band and portions of the C-band pursuant to the ITU filings of the Turkish Administration for that location. Galaxy 26 currently operates at 50.75° E.L. The proposed slight relocation of Galaxy 26 is necessitated by the impending launch of Yahsat-1A to 52.5° E.L. and the need to avoid harmful interference for Galaxy 26's U.S. Government customers.

⁴⁷ C.F.R. § 25.117.

Galaxy 26 (call sign S2469) formerly was known as Intelsat Americas 6 or IA-6.

Command and telemetry will be performed in the C-band. In addition, specific portions of the C-band communications payload will be used for ranging and back-up command, as detailed in the attached Engineering Statement. The remainder of the satellite's C-band communications payload will not be used.

This application has been filed electronically as an attachment to FCC Form 312.⁴

Intelsat provides the technical information relating to the proposed modification on Schedule S and in narrative form in the attached Engineering Statement, pursuant to Section 25.114 of the Commission's rules.⁵

I. PROPOSED MODIFICATION

By this modification application, Intelsat requests authority to relocate Galaxy 26 to, and operate the satellite at, 50.0° E.L. pursuant to the ITU filings of the Turkish Administration. Intelsat is currently operating at the 50.75° E.L. orbital location. At 50.0° E.L., Intelsat will operate Galaxy 26 satellite in the same frequencies as the satellite currently uses at the 50.75° E.L. location. Specifically, Intelsat will operate the Galaxy 26 satellite on the Ku-band frequencies of 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth). Intelsat will conduct Galaxy 26 command, telemetry and ranging in the following C- band frequencies:

Carrier	Frequency
Primary Command	5926.5 MHz (Earth-to-space) (RHCP)
Back-Up Command	6411 MHz (Earth-to-space) (RHCP)
Telemetry	4196.5 MHz (V) or 4199.5 MHz (V)
Ranging	6315 MHz (V) (Earth-to-space)
	4090 MHz (H) (space-to-Earth)

The remainder of the satellite's C-band communications payload will not be used. Intelsat has submitted a request for Special Temporary Authority to begin drifting the Galaxy 26 satellite to

⁴ 47 C.F.R. § 25.117(c).

⁵ 47 C.F.R § 25.114.

⁶ See Policy Branch Information; Actions Taken, Report No. SAT-00613, DA 09-1363, File No. SAT-MOD-20090309-00034 (Jun. 19, 2009) (Public Notice) ("Galaxy 26 Grant for 50.75° E.L.").

⁷ See Galaxy 26 Grant for 50.75° E.L.

50.0° E.L. and begin operating at that location pending grant of this modification application.⁸ The 50.0° E.L. location currently is unoccupied.

II. PUBLIC INTEREST SHOWING

Grant of this modification will serve the public interest because it will allow Intelsat to continue to provide U.S. Government customers with capacity in the Indian Ocean region without risk of harmful interference. The Galaxy 26 satellite is moving from 50.75° E.L. to 50.0° E.L. due to the impending launch of Yahsat-1A to 52.5° E.L. Once Yahsat-1A is onstation, it likely will interfere with the operations of Galaxy 26 at 50.75° E.L. Moving Galaxy 26 to 50.0° E.L. prior to Yahsat-1A being brought into service will allow both satellites to operate without harmful interference.

Grant of this modification request will not result in increased risk of harmful interference.

At 50.0° E.L., Intelsat will operate Galaxy 26 pursuant to the coordination agreements of the

Turkish Administration for that location. 10

III. TECHNICAL WAIVER AND CONDITIONS

Intelsat requests that the waiver of Section 25.202(g) previously granted for Galaxy 26 at 50.75° E.L. continue to apply at 50.0° E.L. In connection with this waiver, Intelsat agrees to accept as a condition a requirement to accommodate future space station networks that are

See Intelsat License LLC, Request for Special Temporary Authority for Galaxy 26, File No. SAT-STA-20110314-00053 (filed Mar. 14, 2011).

Yahsat-1A is expected to launch, with Intelsat's New Dawn satellite, on April 22, 2011. Yahsat-1A is a C-, Ku-, Ka-band satellite.

Intelsat expects shortly to reach an agreement with TurkSat authorizing Intelsat to operate a satellite at 50.0° E.L. and will file a copy of such agreement with the FCC.

¹¹ Galaxy 26 Grant for 50.75° E.L., ¶ 4.

compliant with Section 25.202(g) and to operate Galaxy 26 pursuant to any existing or future coordination agreements for this location.¹²

In addition, at the 50.0° E.L. location, Intelsat agrees to comply with the conditions previously imposed on operation of Galaxy 26 at 50.75° E.L in the 11700-12200 MHz frequency bands. 13

IV. <u>CONCLUSION</u>

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

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

Susan H. Crandall Assistant General Counsel Intelsat Corporation

Jennifer D. Hindin Colleen King WILEY REIN LLP 1776 K Street, N.W. Washington, D.C. 20006 (202) 719-7000

April 20, 2011

¹² *Id*.

¹³ *Id.*, ¶ 3.

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

The Commission previously approved foreign ownership in Intelsat License LLC ("Intelsat") (f/k/a Intelsat North America LLC), in the *Intelsat-Serafina Order*. ¹⁴ In December 2009, the Commission also approved the *pro forma* changes in Intelsat's foreign ownership. ¹⁵ There have been no other material changes to Intelsat's foreign ownership since the date of the *Intelsat-Serafina Order*.

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).

See Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009).

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

Intelsat License LLC ("Intelsat") (f/k/a Intelsat North America LLC), has never had an FCC license "revoked." However, on June 26, 2000, the International Bureau "cancelled" two Kaband satellite authorizations issued to Intelsat's former affiliate, PanAmSat Licensee Corp. ("PanAmSat"), has based on the Bureau's finding that PanAmSat had not satisfied applicable construction milestones. 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 Intelsat's basic qualifications, which are well-established and a matter of public record.

All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. *See* IBFS File Nos. SAT-ASG-20101203-00252 (granted Dec. 23, 2010), SES-ASG-20101203-0150 (granted Dec. 20, 2010), and SES-ASG-20101206-01502 (granted Dec. 20, 2010).

See PanAmSat Licensee Corp., Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).

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

The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

Michael McDonnell, Chairman Flavien Bachabi, Deputy Chairman Phillip Spector, Secretary Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell Flavien Bachabi Phillip Spector

The address of all Intelsat License LLC officers and members of the Board of Managers is:

4 rue Albert Borschette L-1246 Luxembourg

Intelsat License LLC is a wholly owned subsidiary of Intelsat License Holdings LLC, a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Subsidiary Holding Company S.A., a Luxembourg company. Intelsat Subsidiary Holding Company S.A. is wholly owned by Intelsat Phoenix Holdings S.A., a Luxembourg company. Intelsat Phoenix Holdings S.A. is wholly owned by Intelsat Intermediate Holding Company S.A., a Luxembourg company. 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 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 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*").

VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Request of Intelsat License LLC: IBFS File Nos. SAT-STA-20120125-00012; SAT-STA-20111219-00241; SAT-STA-20111207-00236;

SAT-STA-20111123-00227; SAT-STA-20110923-00185; SAT-STA-20110727-00137; SAT-STA-20110314-00053; SAT-MOD-20110420-00073

(Call Sign S2469)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") and Al Yah Satellite Communications Company PrJSC ("Yahsat") have reached a coordination agreement with respect to the parameters under which Galaxy 26 should be able to operate at 50° E.L. so as not to cause excess interference to the operations of Yahsat at 52.5° E.L. As requested by the staff of the International Bureau, Intelsat will, concurrently with filing this letter, separately transmit to the FCC a copy of the coordination agreement.

Intelsat and Yahsat request that the FCC issue Intelsat's requested license modification subject to Intelsat's compliance with the terms of the coordination agreement, including the current December 31, 2013 expiration date.

Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Kalpak Gude
Kalpak Gude
Associate General Counsel

INTELSAT CORPORATION 3400 International Drive, N.W.

Washington, D.C. 20008-3006

/s/ Hazem Moakkit

Hazem Moakkit
Director of Regulatory and Spectrum Affairs
AL YAH SATELLITE COMMUNICATIONS
COMPANY PRJSC
PO Box 93693

Abu Dhabi, United Arab Emirates

cc: Joslyn Read, New Skies Satellites B.V. Karis A. Hastings, SatCom Law LLC Robert Nelson, International Bureau

> Kathyrn Medley, International Bureau Stephen Duall, International Bureau Jay Whaley, International Bureau