

March 1, 2012



Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Request for Clarification – Horizons 2 to 84.85° E.L.  
Call Sign S2423; File No. SAT-MOD-20110928-00190

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) hereby accepts the above referenced grant of authority for the operation of Horizons 2 at 84.85° E.L.<sup>1</sup>, but seeks clarification of condition #6 of that grant.

Condition #6 states that operation in the band 11.7-11.95 GHz should be conducted on an unprotected and non-harmful interference basis with respect to BSS stations operating in accordance with the Regions 1 & 3 Plan in Appendix 30. Intelsat will operate Horizons 2 in the band 11.7-12.2 GHz, as authorized in the grant. However, Intelsat’s operation in the band 11.7-12.2 GHz will be conducted under the ITU filing USABSS-29, which is a modification to the Regions 1 & 3 Appendix 30 Plan. Therefore, as specified in the last paragraph of Section 4.0 of the Engineering Statement that accompanied the Intelsat application, this operation is not being conducted within the Fixed Satellite Service. Intelsat recognizes that the fact that it selected “Fixed Satellite” in the “Nature of Service” entry in Form 312 may have led to the inclusion of condition #6 of the grant. Because Intelsat will be operating a Broadcast Satellite Service in Region 3, and not a Fixed Satellite Service, the condition #6 requirement should not apply.

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<sup>1</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00842, File No. SAT-MOD-20110928-00190 (Feb. 3, 2012) (Public Notice).

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Accordingly, Intelsat respectfully requests that the Commission clarify this point by issuing a revised grant.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall", written in a cursive style.

Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation

Cc: Bob Nelson  
Stephen Duall  
Jay Whaley