

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

In the Matter of

Intelsat License LLC

Application to Modify Authorization for  
Galaxy 12 (Call Sign S2422)

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

**APPLICATION OF INTELSAT LICENSE LLC  
TO MODIFY AUTHORIZATION FOR GALAXY 12**

Intelsat License LLC (“Intelsat”), 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 the authorization for the Galaxy 12 (Call Sign S2422) satellite. Specifically, this application seeks permanent authority to relocate Galaxy 12 to, and to operate the satellite at, 129.0° W.L. As explained below, Intelsat will be moving the satellite from 132.9° W.L. to 129.0° W.L. in order to provide C-band capacity from the 129.0° W.L. 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 provides the technical information relating to the proposed modification on Schedule S and in narrative form pursuant to Section 25.114 of the Commission’s rules.<sup>2</sup>

**I. INTELSAT REQUESTS AUTHORITY TO RELOCATE GALAXY 12 TO 129.0° W.L.**

By this modification, Intelsat requests authority to relocate Galaxy 12 to, and operate the satellite at, 129.0° W.L. In mid-October 2011, pending receipt of FCC approval, Galaxy 12 will

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<sup>1</sup> 47 C.F.R. § 25.117(c).

<sup>2</sup> 47 C.F.R. § 25.114.

be moving from its current location of 133.0° W.L.<sup>3</sup> to 132.9° W.L., where it will serve temporarily as an in-orbit spare.<sup>4</sup> Intelsat intends to begin drifting Galaxy 12 to 129.0° W.L. in December 2011 and have the satellite at that location two to three weeks later.

## II. PUBLIC INTEREST

Grant of this modification application will serve the public interest. As the Commission is aware, Intelsat planned to place Galaxy 12 at 129.0° W.L. in early 2010 after the redeployment of Galaxy 27 (Call Sign S2159).<sup>5</sup> However, due to the anomaly experienced by Galaxy 15 (Call Sign S2387) in 2010, Intelsat instead moved Galaxy 12 to 133.0° W.L. to ensure continuity of service from that location.<sup>6</sup> Having recovered the use of Galaxy 15 for service at 133.0° W.L., Intelsat once again plans to move Galaxy 12 to 129.0° W.L. Grant of this modification application will restore Intelsat's previously intended deployment plan for the Galaxy 12 satellite. It will also benefit customers by enabling Intelsat once again to offer C-band capacity at 129.0° W.L.<sup>7</sup>

Moreover, grant of this modification application will not result in increased risk of harmful interference. Intelsat will operate Galaxy 12 at 129.0° W.L. in accordance with existing coordination agreements and the FCC's rules governing operations at that location vis-à-vis adjacent locations.

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<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File Nos. SAT-MOD-20100120-00013 and SAT-AMD-20100514-00102 (Oct. 22, 2010) (Public Notice).

<sup>4</sup> See *Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20110915-00183 (filed Sept. 15, 2011).

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00713, File No. SAT-T/C-20100112-00009 (Aug. 6, 2010) (Public Notice).

<sup>6</sup> See *supra* n.3.

<sup>7</sup> Intelsat filed a request for waiver of Section 25.161(c) with respect to the 129.0° W.L. location. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00714, File No. SAT-MS-20100628-00160 (Aug. 27, 2010) (Public Notice).

### III. REQUEST FOR WAIVER

Intelsat requests that the waiver of Section 25.283(c) of the Commission's rules previously granted to the Galaxy 12 spacecraft continue to apply at the 129.0° W.L. location.<sup>8</sup> Section 25.283(c) of the Commission's rules requires an applicant to demonstrate that all stored energy will be vented at the spacecraft's end of life.<sup>9</sup>

### IV. CONCLUSION

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

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October 11, 2011

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<sup>8</sup> See *PanAmSat Licensee Corp., Modification of Authorization for Galaxy 12 to 122.9 W.L.*, File No. SAT-MOD-20080630-00133, condition 3 (stamp grant, Sept. 2, 2008).

<sup>9</sup> 47 C.F.R. § 25.283(c).

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

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”), in the *Intelsat-Serafina Order*.<sup>10</sup> In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.<sup>11</sup> There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

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<sup>10</sup> *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).

<sup>11</sup> *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-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, 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”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to a former Intelsat entity, PanAmSat Licensee Corp. (“PanAmSat”),<sup>12</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>13</sup> 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.

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<sup>12</sup> 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).

<sup>13</sup> 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 Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also 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 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*”).