

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization to
Extend License for Galaxy 25

File No. SAT-MOD-2012_____

Call Sign S2154

**APPLICATION OF INTELSAT LICENSE LLC TO MODIFY AUTHORIZATION FOR
GALAXY 25 TO EXTEND THE LICENSE TERM**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”),¹ hereby applies for a 9-year extension, through June 30, 2021, of the license for its Galaxy 25 satellite (call sign S2154). This application has been filed electronically as an attachment to FCC Form 312 and Intelsat incorporates by reference the technical information previously provided regarding the operations of the Galaxy 25 satellite.²

The Galaxy 25 satellite was placed into service on June 30, 1997.³ The Galaxy 25 satellite currently operates at 93.1° W.L.⁴ Pursuant to Sections 25.121(a) and (d)(1) of the

¹ 47 C.F.R. § 25.117.

² *See Policy Branch Information; Actions Taken*, Report No. SAT-00566, File No. SAT-MOD-20080825-00159 (Nov. 21, 2008) (Public Notice).

³ *See* Letter from Philip L. Verveer and Jennifer L. Desmond, Counsel for Loral SpaceCom Corp., to William F. Caton, FCC, File Nos. 65-SAT-P-95; 58-SAT-LA-97 (filed Jul. 1, 1997).

⁴ *See supra* note 2.

Commission's rules, the license term for Galaxy 25 will expire on June 30, 2012.⁵ That expiration date is well before the expected end of life of the satellite. Based on current projections, Galaxy 25 should have sufficient fuel to continue operating, assuming that station-keeping is maintained, through February 2021. The satellite's life could be extended further if Galaxy 25 is placed in an inclined orbit.

Intelsat requests that the Commission modify the license for Galaxy 25 by extending the satellite's term of operation for 9 years from the license expiration date. Intelsat is not proposing any change in Galaxy 25's operations, which will continue to conform to the technical parameters on file with the Commission.⁶ Grant of the modification will serve the public interest by enabling customers to continue receiving service from Galaxy 25. Extending the license term will also promote the continued efficient use of orbital resources.

Moreover, extending the license term of the Galaxy 25 satellite will not affect Intelsat's post mission disposal plan. As detailed in the 2008 modification application, at the end of the mission, Intelsat intends to dispose of the Galaxy 25 satellite by moving it to a minimum altitude of 300 kilometers above the geostationary arc.⁷ Intelsat has reserved 63.5 kilograms of fuel for this purpose.⁸

⁵ 47 C.F.R. §§ 25.121(a) & (d)(1). *See also* Intelsat North America LLC, Application to Modify Authorization to Relocate Galaxy 25 to 93.10° W.L., File No. MOD-20080825-00159, Condition 4 (stamp grant with conditions, Nov. 20, 2008) (noting that grant of the modification application did not change the expiration date for the Galaxy 25 satellite: June 30, 2012).

⁶ *See supra* note 2.

⁷ *Id.*

⁸ The Commission has found that satellites launched prior to March 18, 2002, such as Galaxy 25, would be designated as grandfathered satellites not subject to a specific disposal altitude. *See Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567, 11600-01 (2004).

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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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*.¹ In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.² There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

¹ *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).

² *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”),³ based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.⁴ 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.

³ 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).

⁴ *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*”).