

June 20, 2012

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



Re: Supplement to Application to Modify Authorization for  
Galaxy 25 to Extend the License Term,  
File No. SAT-MOD-20120320-00057, Call Sign S2154

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein supplements the above-referenced pending modification application seeking to extend the license term of Galaxy 25 (call sign S2154).<sup>1</sup> The Galaxy 25 satellite was placed into service on June 30, 1997,<sup>2</sup> and its 15 year license term will expire on June 30, 2012.<sup>3</sup> In the pending modification application, Intelsat applied for a 9-year license extension, through June 30, 2021.<sup>4</sup>

Based on current projections, Galaxy 25 should have sufficient fuel to continue operating, assuming that station-keeping is maintained, through February 2021. The current fuel life projection assumes neither inclined orbit operations nor further redeployment.

The end of life projection detailed in the pending modification application is based on the station-kept fuel life of Galaxy 25. It is not uncommon for a satellite to have a station-kept fuel life that exceeds twenty (20) years. Indeed, this is true of several satellites in the Intelsat fleet. The end of life projection listed in Intelsat’s 10-K filing is the estimated end of service life.<sup>5</sup> The service life is a more conservative estimate which may be

<sup>1</sup> See *Intelsat License LLC Application to Modify Authorization for Galaxy 25*, File No. SAT-MOD-20120320-00057 (filed Mar. 20, 2012).

<sup>2</sup> 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).

<sup>3</sup> 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).

<sup>4</sup> *Id.*

<sup>5</sup> See *Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934*, For the fiscal year ended December 31, 2011, Intelsat S.A. (Mar. 1, 2012) available at

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adjusted subsequently to reflect potential fuel life based on the health of the satellite.

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.<sup>6</sup> Intelsat has reserved 63.5 kilograms of fuel for this purpose.<sup>7</sup>

Consistent with Section 1.62 of the Commission's rules,<sup>8</sup> Intelsat will continue to operate the Galaxy 25 satellite pursuant to the terms and conditions of its expiring license until such time as the Commission makes a final determination with respect to its proper and timely filed license extension application.

Respectfully submitted,

*/s/ Susan H. Crandall*

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[http://www.intelsat.com/\\_files/investors/financial/2011/Q4-2011-Intelsat-Form10K.pdf](http://www.intelsat.com/_files/investors/financial/2011/Q4-2011-Intelsat-Form10K.pdf).

<sup>6</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00566, File No. SATMOD-20080825-00159 (Nov. 21, 2008) (Public Notice).

<sup>7</sup> 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).

<sup>8</sup> 47 C.F.R. § 1.62.