SAT-MOD-20121001-00163 S2388

IB2012002301

Intelsat License LLC **INTELSAT 702** 

From 9/25/14 GRANTED\* International Bureau

File # SAT-MOD-20121001-0016

see also

SAT-AMD-20140204-00019

Call Sign S2388 Grant Date 3/25/14

(or other identifier)

Term Dates conditions Approved by OMB 3060-0678

Date & Time Filed: Oct 1 2012 6:09:51:233PM

File Number: SAT-MOD-20121001-00163

\*with conditions

Approved:

Chief, Satellite Policy Branch

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

FCC 312 MAIN FORM FOR OFFICIAL USE ONLY

FCC Use Only

#### APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu: Application to Modify Authorization for Intelsat 702 (Call Sign S2388)

1-8. Legal	Name of Applicant
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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

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-MOD-20121001-00163, as amended by IBFS File No. SAT-AMD-20140204-00019, to modify the authorization for its Intelsat 702 space station (Call Sign S2388) is GRANTED. Specifically, Intelsat is authorized to operate Intelsat 702 in inclined orbit at the 32.9° E.L. orbital location to provide Fixed-Satellite Service (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz (space-to-Earth), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. Intelsat is also authorized to perform telemetry, tracking, and command operations necessary to maintain Intelsat 702 at the 32.9° E.L. orbital location using the following center frequencies: 3947.5 MHz, 3948.0 MHz, 3952.5 MHz and 3952.0 MHz (space-to-Earth); and 6173.7 MHz and 6176.3 MHz (Earth-to-space). Operations under this authorization must be in accordance with the terms and conditions contained in Intelsat's application and the Federal Communications Commission's rules not waived herein, and are subject to the following conditions:

1. Intelsat must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat shall be held responsible for all cost recovery fees associated with these ITU filings. No protection from interference caused by radio stations authorized by other Administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual Administrations, coordination agreements are successfully completed. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as

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<sup>&</sup>lt;sup>1</sup> The application was placed on Public Notice as accepted for filing on November 9, 2012. The amendment was placed on Public Notice as accepted for filing on January 11, 2013. *See Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT-00910 (IBFS File No. SAT-MOD-20121001-00163); and *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT-01001 (IBFS File No. SAT-AMD-20140204-00019). No comments were filed. On October 19, 2012, Intelsat was granted special temporary authority to drift Intelsat 702 from 47.5 E.L. to 33.0 E.L. to and operate it at the 33.0° E.L. orbital location. SAT-STA-20121001-00164. This special temporary authority was extended through October of 2013. *See* IBFS File Nos. SAT-STA-20121211-00215, SAT-STA-20130212-00021, SAT-STA-20130410-00058, SAT-STA-20130607-00080, SAT-STA-20130808-00104. On November 1, 2013, Intelsat was granted special temporary authority to drift to and operate Intelsat 702 at the 32.9° E.L. orbital position. SAT-STA-20131023-00124. This authority was extended through August of 2014. *See* IBFS File Nos. SAT-STA-20131017-00121, SAT-STA-20131125-00139, SAT-STA-20131219-00147, SAT-STA-20140123-00007, SAT-STA-20140225-00027, SAT-STA-20140424-00041, SAT-STA-20140620-00073. An application for extension of this authority was filed on August 22, 2014 and is currently pending. SAT-STA-20140822-00092.

<sup>&</sup>lt;sup>2</sup> On June 29, 2011, Intelsat notified the Commission of the commencement of inclined orbit operations for Intelsat 702. *See* Letter from Susan H. Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, dated June 29, 2011, available in IBFS File No. SAT-A/O-20000119-00002. The last north-south station-keeping maneuver occurred on May 30, 2011. *Id*.

<sup>&</sup>lt;sup>3</sup> Intelsat indicates that although Intelsat 702 is also capable of operating in the 11.7-11.95 GHz band, it does not plan to operate Intelsat 702 in this band at the 32.9° E.L. orbital location, thus we do not authorize the use of these frequencies at this location. Intelsat 702 operates on all of the same frequencies as Intelsat New Dawn except for the 5850–5925 MHz, 6425–6500 MHz, and 3625–3700 MHz bands. In addition, Intelsat 702 operates in the 12500–12750 MHz band, which is not used by Intelsat New Dawn.

required to effect coordination of the frequency assignments with other Administrations. 47 C.F.R. § 25.111(b).

- 2. While at the 32.9° E.L. orbital location, Intelsat must maintain the Intelsat 702 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
- 3. 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.
- 4. Intelsat must operate Intelsat 702 at the 32.9° E.L. orbital location in compliance with all existing or future coordination agreements for this location.
- 5. Intelsat is authorized to operate the Intelsat 702 space station in the 3700-4200 MHz and 5925-6425 MHz frequency bands as an emergency replacement for operation of these frequencies on the Intelsat 28 space station.<sup>4</sup>
- 6. Intelsat's request that the Part 25 technical waivers originally granted to the Intelsat 702 spacecraft, Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a) of the Commission's rules, 47 C.F.R. §§ 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(i) and 25.211(a), continue to apply at the 32.9° E.L. orbital location, is granted subject to the conditions imposed in the original grant.<sup>5</sup>
- 7. Intelsat's operation of the Intelsat 702 space station in the 10.95-11.2 GHz and 11.45-11.7 GHz bands is subject to footnote US211 to the United States Table of Frequency

<sup>&</sup>lt;sup>4</sup> Intelsat 702 is co-located with Intelsat New Dawn (Call Sign S2751) - now known as Intelsat 28 - which currently operates at 32.8° E.L. IBFS File No. SAT-MOD-20101029-00228. After Intelsat New Dawn's launch on April 22, 2011, Intelsat was unable to deploy the C-band antenna on the spacecraft, thus Intelsat now operates Intelsat New Dawn on only its authorized Ku-band frequencies. Because Intelsat 702 uses the 3700-4200 MHz and 5925-6425 MHz frequency bands that were authorized for Intelsat New Dawn, we grant Intelsat authority to use these frequencies on Intelsat 702 as if it were an emergency replacement space station for Intelsat New Dawn in these Cband frequencies. This action is consistent with prior Commission precedent. See, e.g., Loral Spacecom Corp., Order and Authorization, 13 FCC Rcd 16438 (Sat. Div. 1998) (granted application filed in April 1997 requesting authority to launch and operate a ground spare as an emergency replacement for the Satcom IV satellite that suffered an in-orbit failure in January 1997); Volunteers in Technical Assistance, Order, 12 FCC Rcd 3094 (Int'l Bur. 1997) (granted application filed in January 1996 to launch and operate an emergency replacement satellite for the VITASAT-1 satellite that was destroyed by launch failure in August 1995; replacement satellite to be launched by March 1997); American Telephone and Telegraph Company, Order and Authorization, DA 95-1972, 10 FCC Rcd 12132 (Int'l Bur. 1995) (authorizing the launch and operation of Telstar 402R by December 1995, which was to serve as an emergency replacement satellite for the Telstar 402 satellite lost shortly after its launch in September 1994); Hughes Communications Galaxy, Inc., Memorandum Opinion, Order and Authorization, 8 FCC Red 5089 (1993) (granting Hughes's October 1992 application to construct, launch, and operate an emergency replacement satellite by December 1994 to replace the satellite that failed in August 1992); and GE American Communications. Inc., Order and Authorization, 7 FCC Rcd 3212 (Com. Car. Bur. 1992) (granting GE's October 1991 application to operate the in-orbit Anik D satellite as an emergency replacement for the Satcom IV satellite which failed in the fall of 1991).

<sup>&</sup>lt;sup>5</sup> See Applications of Intelsat LLC For Authority to Operate, and to Further Construct, Launch and Operate C-Band and Ku-Band Global Satellites That Form a Global Communications System in Geostationary Orbit, Memorandum Opinion and Order and Authorization , 15 FCC Rcd 15460, at Appendix C (2000) , recon. denied, 15 FCC Rcd 24234.

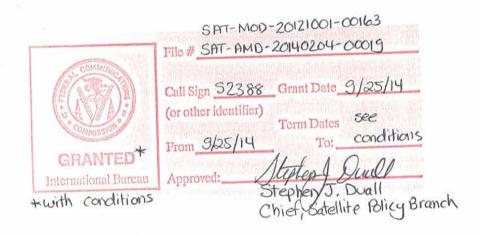
Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

- 8. Intelsat's operation of the Intelsat 702 space station in the 10.95-11.2 GHz and 11.45-11.7 GHz bands is limited to international operations in accordance with footnote NG 52 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG52.
- 9. Intelsat 702 is not authorized to provide FSS in the 12.5-12.70 GHz frequency band in International Telecommunication Union (ITU) Region 2.
- 10. Intelsat 702 is not authorized to provide FSS in the 12.70-12.75 GHz frequency band in the space-to-Earth direction in ITU Region 2.
- 11. Intelsat's operation of the Intelsat 702 space station in the 14.47-14.5 GHz frequency band is subject to US342 of the United States Table of Frequency Allocations, 47 C.F.R § 2.106, US342, which states that services operating in the 14.47-14.5 GHz band shall take all practicable steps to protect the radio astronomy service from harmful interference.
- 12. Operations of Intelsat 702 to or from the United States must comply with the power levels specified in Section 25.212 of the Commission's rules, 47 C.F.R. § 25.212,, unless Intelsat coordinates any operations using power levels exceeding the levels in Section 25.212 with all potentially affected adjacent satellites within 6 degrees orbital separation of the 32.9° E.L. orbital location. Intelsat must inform the Commission of the power levels it has coordinated. In addition, Intelsat must inform all affected earth station operators that Section 25.220 of the Commission's rules applies to operations that exceed the power levels specified in Section 25.212. In no event shall: (1) the uplink power density level of Intelsat 702's digital carriers operating in the 5925-6425 MHz and 14.0-14.5 GHz bands exceed -38.7 dBW/Hz and -45 dBW/Hz, respectively; (2) the downlink EIRP density of the Intelsat 702 digital carriers operating in the 3700-4200 MHz band exceed -32 dBW/Hz; or (3) the downlink EIRP density of the Intelsat 702 digital carriers operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, and 12.5-12.75 GHz bands exceed -20 dBW/Hz.<sup>6</sup>
- 13. Intelsat's operation of Intelsat 702 at the 32.9° E.L. orbital location in the 3700-4200 MHz (space-to-Earth), and 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.70 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands is subject to the following conditions:
  - (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
  - (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.

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<sup>&</sup>lt;sup>6</sup> See Engineering Exhibit at 8.

- 14. This grant of authority is without prejudice to any decision with respect to any replacement expectancy at the nominal 33° E.L. orbital location in the 3625–3700 MHz, 5850–5925 MHz, and 6425–6500MHz bands.<sup>7</sup>
- 15. Nothing in this authorization extends the license term for this space station, Call Sign S2388, which expires on July 18, 2016.
- 16. Intelsat is afforded thirty 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.
- 17. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is 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.



<sup>&</sup>lt;sup>7</sup> Intelsat 702 provides service at 32.9° E.L. on all of the same C-band frequencies that were authorized for Intelsat New Dawn except for the 3625–3700, 5850–5925 MHz, and 6425–6500 MHz MHz bands.

9–16. Name of Contact Representative

Name:

Susan H. Crandall

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Intelsat Corporation

Fax Number:

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E-Mail:

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City:

Washington

**USA** 

State:

DC

Country:

Zipcode:

20008-3006

Attention:

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.

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

**6** 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

o b13. Amendment to a Pending Database Entry Application

b14. Modification of Database Entry

17c. Is a fee submitted with this applicat for If Yes, complete and attach FCC Form	ion? 159. If No, indicate reason for fee exemption (	see 47 C.F.R.Section 1.1114).		
Governmental Entity Noncomme	ercial educational licensee			
Other(please explain):	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 pending modification please enter only the file number:			
(a) Call sign of station:	(a) Date pending application was filed:	(b) File number:		
S2388		SATMOD2008121700233		

## TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide	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)	
<del>-</del>	
	22. If earth station applicant, check all that apply.
only one.	Using U.S. licensed satellites
Common Carrier Non-Common Carrier	Using Non-U.S. licensed satellites
23. If applicant is providing INTERNATIONAL COMMON CARRIER ser facilities:	vice, see instructions regarding Sec. 214 filings. Choose one. Are these
Connected to a Public Switched Network Not connected to a Pu	ublic Switched Network    N/A
24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all app	plicable 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 additional	al frequencies in an attachment)

## TYPE OF STATION

## 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 & Communication)
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	Whate-	
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?	0	Yes	•	No	0	N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one—fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	● Yes O	No <b>O</b> N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	·	
BASIC QUALIFICATIONS		
35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.	Yes	O No
	Narrative & E	Exhibits
36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explination of circumstances.	Yes	O No

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.	○ 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	<b>○</b> 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	<b>⊚</b> 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.	○ Yes	<b>⊚</b> 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	ation 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 Intelsat 702 (S2388) satellite. Specifically, this modification seeks permanent authority to relocate Intelsat 702 to, and to operate the satellite in inclined orbit at, 33.0 E.L. in order to

EngineeringStatement

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.	<b>⊚</b> 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.	<b>o</b> C
	GXT Files

#### **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.

44 A - 1: 4: - () (Cl 4: 1 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 -	1' 11
44. Applicant is a (an): (Choose the button next to app	plicable response.)
o Individual	
O Unincorporated Association	
O Partnership	
O Corporation	
O Governmental Entity	
Other (please specify)	
45. Name of Person Signing	46. Title of Person Signing
Susan H. Crandall	Asst. General Counsel, Intelsat Corporation
>	·
	E ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
	1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312	2(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

#### FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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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 Intelsat 702 (S2388) satellite. Specifically, this modification seeks permanent authority to relocate Intelsat 702 to, and to operate the satellite in inclined orbit at, 33.0 E.L. in order to provide C- and Ku-band capacity to Europe, Africa, and Asia.