

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 8 (S2460)

File No. SAT-MOD-_____

**APPLICATION OF INTELSAT LICENSE LLC TO MODIFY
AUTHORIZATION FOR INTELSAT 8**

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 Intelsat 8 satellite (Call Sign S2460).¹ Specifically, Intelsat seeks to extend the license term for the Intelsat 8 satellite—and extend all previously granted waivers—for approximately three years through June 30, 2016, which is the current projected end of service life taking into account the satellite’s most recent relocation to 169.0° E.L.²

In accordance with the requirements of the Commission’s rules,³ this application has been filed electronically as an attachment to FCC Form 312. Intelsat incorporates by reference

¹ Intelsat 8 was formerly known as PAS-5. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Notification of New Space Station Names (filed Jan. 8, 2007).

² *See Policy Branch Information; Actions Taken*, Report No. SAT-00968, File Nos. SAT-MOD-20120619-00100 and SAT-AMD-20120815-00131 (Aug. 16, 2013) (Public Notice). Intelsat was granted waivers of Sections 2.106 and 25.202(a)(1) of the Commission’s rules, 47 C.F.R. § 2.106 and 25.202(a)(1).

³ 47 C.F.R. § 25.117(c).

the technical information previously provided regarding the operations of Intelsat 8.⁴ Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate the Intelsat 8 satellite pursuant to the terms and conditions of its expiring license,⁵ until such time as the Commission makes a determination with respect to this request.⁶

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to extend the license term for the Intelsat 8 satellite for approximately three years through June 30, 2016. The Intelsat 8 satellite was launched on November 3, 1998, and placed into service in December 4, 1998.⁷ Pursuant to Sections 25.121(a) and (d)(1) of the Commission's rules, the license term for Intelsat 8 will expire on December 4, 2013.⁸ That expiration date is well before the expected end of service life of the satellite. Taking into account the satellite's most recent relocation to 169.0° E.L., Intelsat's most recent estimated end service life for the Intelsat 8 satellite is June 30, 2016.⁹

⁴ The most recent technical information submitted to the Commission relating to Intelsat 8 is found in the modification application and amendment filed to relocate the Intelsat 8 satellite to 169.0° W.L. *See Policy Branch Information; Satellite Space Applications*, Accepted for Filing, Report No. SAT-00895, File No. SAT-AMD-20120815-00131 (Public Notice) (Sept. 7, 2012); *Policy Branch Information; Satellite Space Applications*, Accepted for Filing, Report No. SAT-00883, File No. SAT-MOD-20120619-00100 (Public Notice) (Jul. 20, 2012). These applications recently were granted. *See supra* n. 2.

⁵ *See supra* n.2.

⁶ 47 C.F.R. § 1.62.

⁷ *PanAmSat Licensee Corp.*, Order and Authorization, 14 FCC Rcd 2719 (1998); *see also* Letter from Joseph A. Godles, Attorney for PanAmSat Corporation, to Marlene H. Dortch, Federal Communications Commission, PanAmSat Corporation Annual Status Report, (Jul. 1, 2002) (stating that the satellite was put into service on December 4, 1998).

⁸ 47 C.F.R. §§ 25.121(a) & (d)(1).

⁹ *See* Letter from Jennifer Hindin, Counsel for Intelsat License LLC, to Marlene H. Dortch, FCC, Application to Modify Authorization for Intelsat 8; File No. SAT-MOD-20120619-00100; Call

II. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the Intelsat 8 license term—and previously granted waivers¹⁰—will serve the public interest by enabling customers to continue receiving service from this operational satellite. The Intelsat 8 satellite has at least three years of useful life remaining. There are no single points of failure on Intelsat 8 that would result in an inability to de-orbit the satellite. Additionally, the satellite’s TT&C functions are operating nominally. Extending the license term will promote the continued efficient use of orbital resources and is consistent with recent decisions by the Commission to extend satellite license terms.¹¹

In a 2012 modification application, Intelsat provided a post-mission disposal plan for the Intelsat 8 satellite.¹² This plan demonstrates that the Intelsat 8 satellite has sufficient fuel to dispose of the satellite by moving it to a minimum altitude of 150 kilometers above the geostationary arc.¹³ Intelsat has reserved 28.9 kg kilograms of fuel for this purpose.

Sign S2460 (April 4, 2013); *see also* Amendment No. 9 to Form F-1 Registration Statement, Intelsat Global Holdings S.A. (Apr. 9, 2013), available at <http://www.sec.gov/Archives/edgar/data/1525773/000119312513147847/d204908df1a.htm>.

¹⁰ For operation of the Intelsat 8 satellite at 169.0° E.L., Intelsat has received waivers of Sections 2.106 and 25.202(a)(1), 47 C.F.R. § 2.106 and 25.202(a)(1). *See supra* n. 2.

¹¹ *See, e.g., Policy Branch Information; Actions Taken*, Report No. SAT-00905, DA 12-1680, File No. SAT-MOD-20120629-00109 (Oct. 19, 2012) (Public Notice) (extending license terms of an SES satellite for an additional five years); *Policy Branch Information; Actions Taken*, Report No. SAT-00664, DA 10-236, File No. SAT-MOD-20091119-00123 (Feb. 5, 2010)(Public Notice) (extending license term of Sirius XM satellites for an additional seven years).

¹² *See Policy Branch Information; Satellite Space Applications*, Accepted for Filing, Report No. SAT-00883, File No. SAT-MOD-20120619-00100 (Public Notice) (Jul. 20, 2012).

¹³ The Commission has found that satellites launched prior to March 18, 2002, such as Intelsat 8, 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).

III. 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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August 30, 2013

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 and October 2011, the Commission also approved *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); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011).

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
Michelle Bryan, Secretary
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell
Flavien Bachabi
Michelle Bryan

The business 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 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 Investments S.A., a Luxembourg company. Intelsat Investments S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Investment Holdings S.à r.l., a Luxembourg company. Intelsat Investment Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat S.A.'s ownership was approved by the Commission as part of the *Intelsat-Serafina* Order and the recent Intelsat Pro Forma 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"); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011) ("Intelsat Pro Forma"). On May 16, 2012, the International Bureau granted an application to transfer control of Intelsat pursuant to a public offering of newly issued voting shares by Intelsat, subsequent voting share sales by current shareholders and possible private placements of newly issued voting shares. *In the Matter of Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, DA 12-768 (rel. May 16, 2012). This change of control has not yet been consummated.