

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Modify Authorization for
Intelsat 9 (S2380)

File No. SAT-MOD- _____

**APPLICATION OF INTELSAT LICENSE LLC TO MODIFY AUTHORIZATION
FOR INTELSAT 9**

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 9 satellite (Call Sign S2380). Specifically, Intelsat seeks to extend the license term for the Intelsat 9 satellite through July 31, 2017, which is the current projected end of service life.

In accordance with the requirements of the Commission’s rules,¹ this application has been filed electronically as an attachment to FCC Form 312. Intelsat incorporates by reference the technical information previously provided regarding the operations of Intelsat 9.² Consistent with Section 1.62 of the Commission’s rules,³ Intelsat will continue to operate the Intelsat 9 satellite pursuant to the terms and conditions of its expiring license until such time as the Commission makes a final determination with respect to this request.

¹ 47 C.F.R. § 25.117(c).

² The most recent technical information submitted to the Commission relating to Intelsat 9 is found in SAT-MOD-20120703-00110, which was granted on May 21, 2014. *See Policy Branch Information; Actions Taken*, Report No. SAT-01017, File No. SAT-MOD-20120703-00110 (May 23, 2014) (hereinafter “Intelsat 9 2014 Order”).

³ 47 C.F.R. § 1.62.

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to extend the license term for the Intelsat 9 satellite through July 31, 2017. The Intelsat 9 satellite was placed into service on September 6, 2000.⁴ Pursuant to Sections 25.121(a) and (d)(1) of the Commission's rules, the license term for Intelsat 9 will expire on September 6, 2015. That expiration date is before the expected end of service life of the satellite. Taking into consideration the satellite's commencement of inclined orbit operations in November 2012,⁵ the current projected end of service and maneuver life is July 31, 2017.⁶ To the extent the satellite's projected end of service life is extended in the future, Intelsat will seek an additional license term extension.

II. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the license will serve the public interest by enabling customers to continue receiving service from Intelsat 9. Extending the license term also will promote the continued efficient use of orbital resources. Moreover, extending the license term of the Intelsat 9 satellite will not affect the satellite's post-mission disposal plan. As

⁴ See Letter from Joseph A. Godles, Counsel to PanAmSat Licensee Corp., to Ms. Magalie R. Salas, FCC, File No. SAT-LOA-19990812-00081 (Jan. 12, 2001) (certifying that the PAS-23 spacecraft had been successfully placed into orbit). The PAS-23 satellite was subsequently renamed Intelsat 9. See Letter from Susan H. Crandall, Intelsat Corporation, to Marlene H. Dortch, FCC, Re: Intelsat North America LLC and PanAmSat Licensee Corp., Notification of New Space Station Names (filed Jan. 8, 2007).

⁵ Intelsat began operating Intelsat 9 in inclined orbit in late 2012. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Nov. 7, 2012) (notifying the FCC of the commencement of inclined orbit operations).

⁶ Intelsat notes that its most recent annual report lists the estimated end of service life for Intelsat 9 as Q4 2016. See Intelsat S.A., Form 20-F at 35, available at <http://investors.intelsat.com/phoenix.zhtml?c=131114&p=irol-sec>. The end of life projection detailed in the instant modification application is based on the recently updated fuel life of Intelsat 9. Specifically, using diurnal thermal gauging, Intelsat recently updated the Intelsat 9 estimated end of service life to July 31, 2017.

approved in the most recent Intelsat 9 modification application,⁷ Intelsat intends to dispose of the Intelsat 9 satellite by moving it to a minimum altitude of 150 kilometers above the geostationary arc⁸ and has reserved 39.7 kilograms of fuel for this purpose.⁹ There are no single points of failure on the satellite that would affect the ability to de-orbit the satellite.¹⁰ Moreover, there is no reason to believe the spacecraft will not continue to provide service to customers for the full extended license term requested.

III. CONCLUSION

For the reasons set forth above, Intelsat respectfully requests that the Commission grant this modification application.

⁷ See Intelsat 9 2014 Order.

⁸ The Commission has designated satellites launched prior to March 18, 2002, such as Intelsat 9, 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).

⁹ See Intelsat 9 2014 Order, Engineering Statement at 7. Intelsat notes that the Satellite Industry Association's pending request for blanket waiver of Section 25.283(c) includes the Intelsat 9 satellite. *Pleading Cycle Established for Comment on Satellite Industry Association's Blanket Waiver Request Concerning Relieving Satellite Pressure Vessels*, IB Docket No. 02-54, DA 10-2291 (Dec. 14, 2010)(Public Notice).

¹⁰ The Xenon Ion propulsion system on Intelsat 9 is nonoperational. Intelsat uses the liquid propulsion for all East-West station-keeping on Intelsat 9.

Respectfully submitted,

/s/ Susan H. Crandall

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April 29, 2015

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
Franz Russ, Deputy Chairman
Michelle Bryan, Secretary
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell
Franz Russ
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 transaction has not yet been fully consummated.