

S2404 SAT-MOD-20151020-00072 IB2015001980  
Intelsat License LLC  
INTELSAT 805



\*with conditions

File # SAT-MOD-20151020-00072

\*\* see also  
SAT-AMD-20151120-00071

Call Sign S2404 Grant Date 02/24/16  
(or other identifier)

From 02/24/16 To: conditions

Term Dates see Approved by OMB  
3060-0678

Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Satellite Policy Branch

Date & Time Filed: Oct 20 2015 11:55:28:090AM  
File Number: SAT-MOD-20151020-00072

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD - MAIN FORM	FCC Use Only
FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Application to Modify Authorization for Intelsat 805 (Call Sign S2404)

1-8. Legal Name of Applicant			
Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA Name:		Fax Number:	703-559-8539
Street:	c/o Intelsat Corporation 7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:	Susan H. Crandall		

**Intelsat License LLC**  
**IBFS File Nos. SAT-MOD-20151020-00072; SAT-AMD-20151120-00077**  
**Call Sign S2404**

The application of Intelsat License LLC (Intelsat) to modify the authorization for its Intelsat 805 space station, IBFS File No. SAT-MOD-20151020-00072, as amended by IBFS File No. SAT-AMD-20151120-00077, is GRANTED.<sup>1</sup> Intelsat is authorized to provide Fixed-Satellite Service (FSS) via Intelsat 805 (Call Sign S2404) at the 169.0° E.L. orbital location, instead of its currently authorized orbital location of 55.5° W.L., in the 3400-4200 MHz (space-to-Earth), 5850-6650 MHz (Earth-to-space), 12.5-12.75 GHz (space-to-Earth), and 14.0-14.25 GHz (Earth-to-space) frequency bands. Intelsat is also authorized to conduct Telemetry, Tracking, and Command (TT&C) operations necessary to maintain the Intelsat 805 space station at the 169.0° E.L. orbital location using the following center frequencies: 3947.5 MHz, 3948.0 MHz, 3950 MHz, 3952.0 MHz, 3952.5 MHz, and 12.501 GHz (space-to-Earth), and 6173.7 MHz, and 6176.3 MHz (Earth-to-space). Finally, the license term for Intelsat 805, which expires on July 18, 2016, is extended through December 31, 2019. 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 and are subject to the following conditions:

1. For operation in the frequency bands 3400-3700 MHz, 5850-5925 MHz, and 6425-6650 MHz at the nominal orbital location of 169° E.L, 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 ITU filings. We also note that 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, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. See 47 C.F.R. § 25.111(b).
2. While at the 169.0° E.L. orbital location, Intelsat must maintain the Intelsat 805 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
3. Intelsat must coordinate the operations of Intelsat 805 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 169.0° E.L. orbital location.
4. 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.
5. Intelsat must operate Intelsat 805 at the 169.0° E.L. orbital location in compliance with all existing or future coordination agreements for this location.
6. Use of the 3400-3600 MHz (space-to-Earth) frequency band is not permitted for non-Federal FSS in the United States Table of Frequency Allocations, 47 C.F.R. § 2.106. Intelsat must not permit any earth station in the United States or its possessions to operate with the Intelsat 805 space station in the 3400-3600 MHz (space-to-Earth) frequency band.<sup>2</sup>
7. Intelsat must inform its customers and operators using the 3400-3600 MHz (space-to-Earth) frequency band of the potential for interference from U.S. government operations worldwide.

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<sup>1</sup> The application was placed on Public Notice as accepted for filing on December 11, 2015. See *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT-01112, (IBFS File No. SAT-MOD-20151020-00072).

<sup>2</sup> Intelsat states that the 3400-3600 MHz band will not be used in the United States. Legal Narrative, IBFS File No. SAT-LOA- SAT-MOD-20151020-00072, at 9.

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8. Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to GN Docket No. 12-354, which limits FSS communications within the United States in the 3600-3650 MHz band on a primary basis to existing earth stations or to new earth stations within 10 miles of existing earth stations.<sup>3</sup> All other FSS earth station operations in the band 3600-3650 MHz must be on a secondary basis.

9. Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 3600-3650 MHz use of the non-Federal FSS is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.

10. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG185, which states that the 3650-3700 MHz use of the non-Federal FSS is limited to international inter-continental systems.

11. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG169 of the United States Table of Frequency Allocations, which states that after December 1, 2000, operations on a primary basis by the FSS (space-to-Earth) in the band 3650-3700 MHz must be limited to grandfathered earth stations. All other FSS earth station operations in the band 3650-3700 MHz must be on a secondary basis.

12. Use of the 5850-5925 MHz frequency band shall comply with the terms of Footnote US245 to the U.S. Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, and Section 2.108 of the Commission's rules, 47 C.F.R. § 2.108, which states that the 5850-5925 MHz use of the non-Federal fixed-satellite service is limited to international, intercontinental satellite systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat shall not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.<sup>4</sup>

13. Intelsat is directed to bear in mind the needs of the passive services when operating the Intelsat 805 space station in the 6425-6650 MHz frequency band pursuant to Footnote 5.458 to the United States Table of Frequency Allocations, 47 C.F.R. §2.106, Footnote 5.458.

14. Intelsat's request that the prior waivers granted to Intelsat 805 for Sections 25.202(a)(1)<sup>5</sup>, 25.202(g), 25.210(a)(3), 25.210(i)(1), and 25.210(f) of the Commission's rules be extended to the operation of Intelsat 805 at 169.0° E.L.; is GRANTED, subject to the conditions in the original grant.<sup>6</sup>

15. Intelsat's request for waivers of Sections 25.202(a)(1) and 2.106 of the Commission's rules, 47 C.F.R. §§ 25.202(a)(1) and 2.106, which allocate 12.5-12.7 GHz to Fixed Service (FS) and Broadcast Satellite Service (BSS), and 12.7-12.75 GHz to FS, Mobile Service, and FSS (Earth-to-space) in International Telecommunication Union (ITU) Region 2, is GRANTED. Intelsat's operations in these

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<sup>3</sup> *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Notice of Proposed Rulemaking and Order, 27 FCC Rcd 15594, 15646, ¶ 168 (2012).

<sup>4</sup> For technical information of these radiolocation systems, see NTIA Report 83-115, Spectrum Resource Assessment in the 5650-5925 MHz Band, and NTIA Report 00-373, Measured Occupancy of 5850-5925 MHz and Adjacent 5-GHz Spectrum in the United States at <http://www.its.bldrdoc.gov/pub/pubs.php>.

<sup>5</sup> The existing waiver of Section 25.202(a)(1) applies only to C-band frequencies on Intelsat 805.

<sup>6</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 25234. We note that one of the original waived rules, Section 25.210(g)(1), 47 C.F.R. § Section 25.210(g)(1), which required full frequency reuse, is now included in Section 25.210(f), 47 C.F.R. § Section 25.210(f).

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bands at the 169.0° E.L. orbital location will be solely in Region 3, in which the 12.5–12.75 GHz band is allocated to FSS in the space-to-Earth direction, and thus conforms to the International Table of Frequency Allocations. Further, under the ITU Region 2 BSS Plan, there is at least 15.8 degrees of orbital separation between Intelsat 805 at 169.0° E.L. and the nearest possible BSS network that could provide service to any portion of the ITU Region 2, so it is unlikely that operations of Intelsat 805 will interfere with any BSS networks in Region 2.

16. The operations of Intelsat 805 and associated earth stations must comport with the applicable uplink limits in 47 C.F.R. §§ 25.211, 25.212, 25.218, 25.222, 25.226, and/or 25.227, and the downlink limit in 47 C.F.R. § 25.212(c)(2), unless Intelsat coordinates any non-conforming operation with the operations of U.S.-licensed GSO space stations within 6 degrees of 169.0° E.L. Non-conforming operation must also be coordinated with respect to those operations of non-U.S.-licensed space stations within 6 degrees of 169.0° E.L. involving approved communications with U.S.-licensed earth stations pursuant to Section 25.137 of the Commission's rules, 47 C.F.R. § 25.137.

17. Intelsat's request for waivers of Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission's rules, 47 C.F.R. §§ 25.114(d)(14)(ii), 25.283(c), is granted. Sections 25.114(d)(14)(ii) and 25.283(c) specify that space stations must discharge all stored energy sources at end-of-life of the space station. Intelsat 805 does not completely discharge all stored energy at end of life. Intelsat states that residual oxidizer will not be vented at the spacecraft's end of life because the two tanks containing this oxidizer were sealed shortly after the satellite's launch. Intelsat further states that Intelsat 805 has two helium tanks with a volume of 68.63 liters each, and the estimated mass and pressure of residual helium in each tank will be 414.0 grams and 527.9 psia at 17.3 degrees C, respectively, at end of life.<sup>7</sup> The information submitted by Intelsat is not sufficient to support a finding that the underlying purpose of Section 25.283(c) is served by sealing the oxidizer tanks without completely venting them. Nevertheless, we grant Intelsat a partial waiver of Sections 25.114(d)(14)(ii) and 25.283(c). Intelsat 805 was launched and the tanks sealed before Section 25.283(c) was adopted. Furthermore, compliance with Section 25.283(c) would require direct retrieval of the spacecraft or launching a servicing mission to the spacecraft, which is not practicable at this time. This action is without prejudice to future licensing decisions in connection with other spacecraft of the same manufacturing series.

18. Intelsat requests waiver of the requirement to meet milestones or post a bond for operations at 169.0° E.L., pursuant to Sections 25.164(a) and 25.165 of the Commission's rules, 47 C.F.R. §§ 25.164(a) and 25.165. Because Intelsat 805 is already in-orbit and operating at 169.0° E.L. pursuant to grants of special temporary authority, grant of authority to operate Intelsat 805 at 169.0° E.L. is not subject to milestone conditions and Intelsat is not required to post a bond. As such, waiver of Sections 25.164(a) and 25.165 of the Commission's rules is not necessary.

19. Intelsat is afforded thirty days from the date of this action to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.


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<sup>7</sup> See Engineering Statement in Intelsat's application, IBFS File No. SAT-MOD-20151020-00072, at 7.

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20. 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.

SAT-MOD-20151020-00072

 <b>GRANTED*</b> International Bureau	<b>File #</b> SAT-AMD-20151120-00077
	<b>Call Sign</b> S2404 <b>Grant Date</b> 02/24/16 (or other identifier)
	<b>Term Dates</b> see
	<b>From</b> 02/24/16 <b>To:</b> conditions
	<b>Approved:</b> <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

\* with conditions

9-16. Name of Contact Representative

<b>Name:</b>	Susan H. Crandall	<b>Phone Number:</b>	703-559-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102-5972
<b>Attention:</b>		<b>Relationship:</b>	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.

- a1. 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
- b3. Amendment to a Pending Application
- b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- 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
- b13. Amendment to a Pending Database Entry Application
- b14. Modification of Database Entry

17c. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity     Noncommercial educational licensee

Other (please explain):

17d.

Fee Classification BFY – Space Station Modification (Geostationary)

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:  
S2404

19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:

(a) Date pending application was filed:                      (b) File number:  
  
SATMOD2002091900178

TYPE OF SERVICE

<p>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:</p> <p><input checked="" type="checkbox"/> a. Fixed Satellite <input type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input type="checkbox"/> d. Earth Exploration Satellite <input type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one. <input type="radio"/> Common Carrier    <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply. <input type="checkbox"/> Using U.S. licensed satellites <input type="checkbox"/> Using Non-U.S. licensed satellites</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities: <input type="radio"/> Connected to a Public Switched Network    <input type="radio"/> Not connected to a Public Switched Network    <input checked="" type="radio"/> N/A</p>	
<p>24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s). <input checked="" type="checkbox"/> a. C-Band (4/6 GHz)    <input checked="" type="checkbox"/> b. Ku-Band (12/14 GHz) <input type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower:    Frequency Upper: (Please specify additional frequencies in an attachment)</p>	



TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive    Transmit-Only    Receive-Only    N/A

"For Space Station applications, select N/A."

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 & countries)
- j -- authorization to change Points of Communication (satellites & countries)
- k -- authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l -- 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.  Yes  No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> 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?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> 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  No  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?  Yes  No  
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

EngineeringStatement

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 explanation of circumstances.  Yes  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 explanation 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

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 exhibit, an explanation of the circumstances.

Yes  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  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  No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

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 805 satellite, Call Sign S2404. Specifically, this modification seeks authority to relocate Intelsat 805 to, and to operate the satellite at, 169.0 E.L.

Narrative & Exhibits

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.

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.

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.

C

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. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing  
Susan H. Crandall

→

46. Title of Person Signing  
Assoc. General Counsel, Intelsat Corporation

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).



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