

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”),<sup>1</sup> hereby seeks to modify the authorization for the Intelsat 8 (Call Sign S2460) satellite. Specifically, this modification seeks authority to relocate Intelsat 8 to, and to operate the satellite at, 168.9° E.L. At this location, which is 0.1° from its current licensed location of 169.0° E.L., Intelsat 8 will continue to provide services in the C- and Ku-bands. Intelsat specifically requests authority to continue operating the communications payload on the satellite while drifting Intelsat 8 to 168.9° E.L. In addition, Intelsat seeks to extend the license term for Intelsat 8, and extend all previously granted waivers, for approximately three years through September 30, 2018, which is the current projected end of service life.

In accordance with the requirements of the Commission’s rules,<sup>2</sup> this application has been filed electronically as an attachment to FCC Form 312. Intelsat provides the technical

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<sup>1</sup> 47 C.F.R. § 25.117.

<sup>2</sup> 47 C.F.R. § 25.117(c).

information relating to the proposed modification on Schedule S and in narrative form in the attached Engineering Statement.<sup>3</sup>

**I. PROPOSED MODIFICATIONS**

**A. Relocation to 168.9° E.L.**

Intelsat requests authority to relocate Intelsat 8 to, and operate the satellite at, 168.9° E.L. Intelsat 8 currently is authorized to operate at 169.0° E.L.,<sup>4</sup> and is expected to begin inclined orbit operations on or about March 1, 2016. Intelsat 805 (Call Sign S2404) is expected to arrive at 169.0° E.L. on or about March 1, 2016.<sup>5</sup> Following the transfer of some of the Intelsat 8 traffic to Intelsat 805, Intelsat 8 will be relocated to the 168.9° E.L. orbital location. Intelsat expects to begin drifting Intelsat 8 on or about April 1, 2016 and have the satellite on station at 168.9° E.L. a few days later. Intelsat 8 and Intelsat 805 are expected to remain collocated at the nominal 169.0° E.L. orbital location.

For the Commission's convenience, the following chart reflects the frequencies that will be used by Intelsat 8 at 168.9° E.L. and by Intelsat 805 at 169.0° E.L. upon receipt of Commission approvals and completion of drifts.

| Frequency Bands | Intelsat 8 | Intelsat 805 |
|-----------------|------------|--------------|
| 3400-3700 MHz   |            | X            |
| 3700-4200 MHz   | X          | X            |
| 5850-5925 MHz   |            | X            |
| 5925-6425 MHz   | X          | X            |
| 6425-6650 MHz   |            | X            |
| 12250-12500 MHz | X          |              |
| 12500-12750 MHz | X          | X            |

<sup>3</sup> 47 C.F.R. § 25.114.

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-00987, File No. SAT-MOD-20130830-00110 (Dec. 20, 2013) (Public Notice).

<sup>5</sup> See *Application of Intelsat License LLC for Special Temporary Authority*, Call Sign S2404, File No. SAT-STA-20151002-00068 (filed Oct. 2, 2015).

|                 |                |   |
|-----------------|----------------|---|
| 13997-14000 MHz | X <sup>6</sup> |   |
| 14000-14250 MHz | X              | X |
| 14250-14500 MHz | X              |   |

The specific Intelsat 8 TT&C frequencies are as follows:

Uplink:

13998 MHz (RHCP)

Downlink:

3702 (H)

12747 (H)

12748 (V)

12747 (LHCP)

12748 (LHCP)

**B. Extension of License Term**

Intelsat seeks to extend the license term for the Intelsat 8 satellite for approximately three years through September 30, 2018. The Intelsat 8 satellite was launched on November 3, 1998, and placed into service in December 4, 1998.<sup>7</sup> The license term for Intelsat 8 will expire on June 30, 2016.<sup>8</sup> That expiration date is well before the expected end of service life of the satellite, which was most recently estimated to be in September 2018, assuming commencement of inclined orbit operations by March 2016.

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<sup>6</sup> Included for the purpose of authorizing Intelsat's use of the 13998.0 MHz command link.

<sup>7</sup> *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).

<sup>8</sup> *Intelsat License LLC, Application to Modify Authorization for Intelsat 8 (S2460)*, File No. SAT-MOD-20130830-00110 (stamp grant Dec. 19, 2013).

## II. PUBLIC INTEREST SHOWING

Grant of this modification application to relocate and extend the license term of Intelsat 8 will serve the public interest by enabling Intelsat to provide continuity of service to customers at the nominal 169.0° E.L. location. Although Intelsat 805, upon its arrival at 169.0° E.L., will provide station-kept service for those customers requiring such service, Intelsat 8 will continue to serve customers in inclined orbit mode from 168.9° E.L and can continue providing such service well beyond the current license term's June 30, 2016 expiration date.

Grant of the relocation request will not result in an increased risk of harmful interference. During the short drift from 169.0° E.L to 168.9° E.L., Intelsat will operate the above listed TT&C frequencies, as well as the communications frequencies, and will coordinate the Intelsat 8 transmissions internally with the operations of Intelsat 805. There are no other operators of co-frequency satellites in the drift path. Customers on Intelsat 8 will not experience service degradation because they will be tracking the satellite during the drift.<sup>9</sup> Once on-station at 168.9° E.L., Intelsat will operate the Intelsat 8 satellite's communications payload and TT&C frequencies in conformance with Intelsat's coordination agreements regarding the nominal 169.0° E.L. orbital location and the FCC's rules governing operations vis-à-vis adjacent locations.

Grant of the license term extension request will serve the public interest by enabling customers to continue receiving service from an operational satellite with at least three years of useful life remaining. There are no single points of failure on Intelsat 8 that would result in an

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<sup>9</sup> The Commission previously has authorized a .1° drift during which the satellite's communications payload remained operational. *See Policy Branch Information; Actions Taken*, Report No. SAT-00998, File No. SAT-STA-20140212-00022 (Feb. 21, 2014) (Public Notice).

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 past decisions by the Commission to extend satellite license terms.<sup>10</sup>

### **III. WAIVER**

Intelsat requests that the waiver previously granted to Intelsat 8 at 169.0° E.L. be extended to the satellite at 168.9° E.L. and to Intelsat 8's extended license term. In particular, Intelsat requests that the previously-granted waiver of Section 2.106 -- to permit Intelsat 8 to transmit in the 12250–12750 MHz frequency band for commercial Fixed-Satellite Service ("FSS") on a non-interference, non-protected basis to any earth station in International Telecommunication Union ("ITU") Region 2 -- be extended to the satellite at 168.9° E.L., for the reasons set forth in the previous grant.<sup>11</sup>

### **IV. ORBITAL DEBRIS STATEMENT**

Intelsat has assessed and limited the probability of the Intelsat 8 space station becoming a source of debris as a result of collision with large debris or other operational space stations at 168.9° E.L. Intelsat 8 and Intelsat 805 will be operated in the same 169.0° E.L. station-keeping box until Intelsat 8 is relocated. Once relocated to 168.9° E.L., Intelsat 8 will not have an overlapping station-keeping volume with any other satellite. Further, Intelsat is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC,

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<sup>10</sup> 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).

<sup>11</sup> See *supra* n. 4.

having an overlapping station-keeping volume with Intelsat 8 at 168.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 8 at 168.9° E.L. that is the subject of an ITU filing and that is either in orbit or progressing toward launch.

Intelsat expects to operate Intelsat 8 at 168.9° E.L. until its end-of-service life, which, as discussed above, currently is anticipated to be September 2018, assuming commencement of inclined orbit operations by March 2016. The Commission has previously concluded that Intelsat's post-mission disposal plan, which would dispose of the Intelsat 8 satellite to minimum altitude of 150 km above GEO arc, "demonstrates its operation raises no public interest concerns related to orbital debris."<sup>12</sup> Intelsat has reserved 26.1 kilograms of fuel for this purpose.<sup>13</sup>

## V. CONCLUSION

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

Respectfully submitted,

Intelsat License LLC

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October 21, 2015

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<sup>12</sup> See *In the Matter of PanAmSat License Corp. Application for Modification of Authority to Operate the Pas-5 Satellite at the 166° degrees E.L. Orbital Location*, Order and Authorization, DA 06-6, File Nos. SAT-MOD-19980928-00078, SAT-AMD-19990222-00024, SAT-AMD-20020326-00055, SAT-STA-20020705-00097, and SAT-AMD-20051116-00220, 21 FCC Rcd 36, ¶ 16 (Jan. 4, 2006).

<sup>13</sup> See Engineering Statement at 7.

## 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*.<sup>1</sup> In December 2009 and October 2011, the Commission also approved *pro forma* changes in Intelsat’s foreign ownership.<sup>2</sup> There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

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<sup>1</sup> *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).

<sup>2</sup> *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”),<sup>3</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>4</sup> 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.

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<sup>3</sup> All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. *See* 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).

<sup>4</sup> *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  
Mirjana Hervy, 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 change of control has not yet been fully consummated.