

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 10 (S2382)

File No. SAT-MOD- _____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR INTELSAT 10**

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 10 (call sign S2382) satellite.¹ Specifically, Intelsat seeks to extend the license term for the Intelsat 10 satellite through September 30, 2026, which is the current projected end of service life.

In accordance with the requirements of the Commission’s rules,² 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 10.³

¹ Intelsat 10 was formerly known as PAS-10 and PAS-24. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Notification of New Space Station Names (filed Jan. 8, 2007).

² 47 C.F.R. § 25.117(c).

³ The most recent technical information submitted to the Commission relating to Intelsat 10 is found in SAT-MOD-20130322-00052, which was granted on October 23, 2013. *See Policy Branch Information; Actions Taken*, Report No. SAT-00976, File No. SAT-MOD-20130322-00052 (October 25, 2013).

Consistent with Section 1.62 of the Commission's rules,⁴ Intelsat will continue to operate the Intelsat 10 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.

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to extend the license term for the Intelsat 10 satellite through September 30, 2026. The Intelsat 10 satellite was launched on May 15, 2001, placed into service on July 2, 2001,⁵ and is currently authorized to operate at 47.5° E.L.⁶ Pursuant to Sections 25.121(a) and (d)(1) of the Commission's rules, the license term for Intelsat 10 will expire on July 2, 2016.⁷ This expiration date is well before the expected end of service life of the Intelsat 10 satellite, which is mid-to-late 2026. Accordingly, Intelsat herein is seeking an extension of the Intelsat 10 license term based on the satellite's current projected end of service life.

II. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the Intelsat 10 license term will serve the public interest by enabling customers to continue receiving service from this operational satellite. The Intelsat 10 satellite has at least ten more years of useful life remaining. The Intelsat 10 satellite subsystems and solar panels are functioning normally, and there are no single points of failure on Intelsat 10 that would result in an inability to de-orbit the satellite. Additionally, the

⁴ 47 C.F.R. § 1.62.

⁵ See Letter from Joseph A. Godles, Counsel to PanAmSat Licensee Corp., to Ms. Magalie R. Salas, FCC, File No. SAT-LOA-19991119-00112 (Jan. 4, 2002) (certifying that the PAS-24 spacecraft had been successfully placed into orbit). The PAS-24 satellite was subsequently renamed Intelsat 10. See Letter from Susan H. Crandall, *supra* note 1.

⁶ See *Policy Branch Information; Actions Taken*, Report No. SAT-00976, File No. SAT-MOD-20130322-00052 (Oct. 25, 2013) (Public Notice).

⁷ 47 C.F.R. §§ 25.121(a) & (d)(1).

satellite's TT&C functions are operating normally. 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.⁸

In a 2013 modification application, and in a 2015 revised supplement, Intelsat provided a post-mission disposal plan for the Intelsat 10 satellite.⁹ This plan demonstrates that the Intelsat 10 satellite has sufficient fuel to dispose of the satellite by moving it to a minimum altitude of 175 kilometers above the geostationary arc.¹⁰ Intelsat has reserved 30.1 kg of fuel for this purpose. Grant of the requested license extension will not affect the 30.1 kg fuel reserve.

⁸ See, e.g., *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 terms of Sirius XM satellites for an additional seven years); *See Policy Branch Information; Actions Taken*, Report No. SAT-01117, File No. SAT-MOD-20150820-00059 (Nov. 6, 2015) (extending license term of an SES satellite for an additional eight years).

⁹ See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, File No. SAT-MOD-20130322-00052; Call Sign S2382 (Apr. 15, 2015) (notifying the Federal Communications Commission of a revised post-mission disposal statement with respect to the Intelsat 10 satellite); *see Policy Branch Information; Actions Taken*, Report No. SAT-00976, File No. SAT-MOD-20130322-00052 (Oct. 25, 2015). The FCC has granted Intelsat a waiver 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) and 25.283(c), which require that spacecraft are able to vent all pressurized systems at end of life. *Id.*

¹⁰ The Commission has found that satellites launched prior to March 18, 2002, such as Intelsat 10, 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 (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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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*.¹¹ In December 2009 and October 2011, the Commission also approved *pro forma* changes in Intelsat’s foreign ownership.¹² There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

¹¹ *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).

¹² *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”),¹³ based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.¹⁴ 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.

¹³ 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).

¹⁴ 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:

Franz Russ, Deputy Chairman
Michelle Bryan, Secretary
Mirjana Hervy, Director, Finance

Board of Managers:

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.