

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 902 (S2406)

File No. SAT-MOD- _____

APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR INTELSAT 902

Intelsat License LLC (“Intelsat”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”),¹ hereby seeks to modify the authorization for the Intelsat 902 satellite (Call Sign S2406).² Specifically, Intelsat seeks to extend the license term for the Intelsat 902 satellite, and all previously granted waivers, through September 30, 2022.³

¹ 47 C.F.R. § 25.117

² *INTELSAT LLC, Application to Modify Authorizations to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit; Request for Special Temporary Authority to Conduct In-Orbit Testing of the INTELSAT 902 satellite at 58.5° E.L.; Request for Special Temporary Authority to Relocate the INTELSAT 901 Satellite to 53° W.L., Order and Authorization, 16 FCC Rcd 16208 (2001) (“Intelsat 902 Modification Order”).*

³ The current projected end of service life for Intelsat 902, assuming no inclined orbit operation, is September 2019. Intelsat is seeking authority for approximately three years beyond the current projected end of Intelsat 902’s service life to accommodate possible inclined orbit operation.

In accordance with the requirements of the Commission's rules,⁴ 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 902.⁵ Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate the Intelsat 902 satellite pursuant to the terms and conditions of its expiring license 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 902 satellite through September 30, 2022. The Intelsat 902 satellite is currently operating at 62.0° E.L.⁷ and was placed into service on October 15, 2001.⁸ Pursuant to Sections 25.121(a) and (d)(1) of the Commission's rules, the license term for Intelsat 902 will expire on October 15, 2016.⁹ This expiration date is well before the expected end of service life, which was most recently estimated to be September 2019, assuming no inclined orbit operation; inclined orbit operation would extend Intelsat 902's expected end of service life into late 2022. In order to accommodate the possibility of inclined orbit operation, Intelsat is requesting that the license term be extended through September 30,

⁴ 47 C.F.R. § 25.117(c).

⁵ *See supra* note 2; *see also Applications of Intelsat LLC for Authority to Operate, and to Further Construct, launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, 15 FCC Red 15460, *recon. denied*, 15 FCC Red 25234 (2000), further proceedings, 16 FCC Red 12280 (2001).

⁶ 47 C.F.R. § 1.62.

⁷ *See supra* note 2.

⁸ *See* Letter from Jennifer D. Hindin, Counsel for Intelsat LLC, to Ms. Magalie Roman Salas, FCC, File No. SAT-MOD-20010509-00038 (Oct. 17, 2001).

⁹ 47 C.F.R. §§ 25.121(a) & (d)(1).

2022. To the extent the satellite's projected end of service life is extended in the future, Intelsat will seek an additional license term.

II. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the license term will serve the public interest by enabling customers to continue receiving service from Intelsat 902. Extending the license term will also promote the continued efficient use of orbital resources and is consistent with recent decisions by the Commission to extend satellite license terms.¹⁰ There are no single points of failure on Intelsat 902 that would result in an inability to de-orbit the satellite. Additionally, the satellite's TT&C functions are operating nominally.

As outline in the attached Orbital Debris Mitigation Plan, Intelsat intends to dispose of the spacecraft by moving it to an altitude of at least 150 kilometers above the geostationary arc. Intelsat has reserved 52.5 kilograms of fuel for this purpose. In 2004 the FCC declared that satellites launched prior to March 18, 2002, such as the Intelsat 902 satellite, would be designated as grandfathered satellites not subject to a specific disposal altitude.¹¹ Therefore, the planned disposal orbit for Intelsat 902 complies with the FCC's rules.

¹⁰ See *Policy Branch Information; Actions Taken*, Report No. SAT-01156, File No. SAT-MOD-20160219-00019 (May 6, 2016) (Public Notice) (granting license extension for Intelsat 1R, a station-kept satellite, based on the satellite's current projected end of service including future inclination).

¹¹ 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 to extend the Intelsat 902 license term through September 30, 2022.

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

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August 16, 2016

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:

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

Board of Managers:

Jacques Kerrest
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