

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 29e (S2913)

File No. SAT-MOD- _____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR INTELSAT 29e**

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 29e (Call Sign S2913) satellite. Specifically, this modification application seeks authority to operate Intelsat 29e’s command channels with center frequencies in the ranges 5850.5 - 5853.0 MHz and 6422 - 6424.5 MHz, selectable via ground command in 100 kHz steps.

In accordance with the requirements of the Commission’s rules,¹ this application has been filed electronically as an attachment to FCC Form 312. Pursuant to Section 25.117(d)(1), Intelsat certifies that, except for the requested change in command frequencies, all of the technical information for the Intelsat 29e satellite already on file with, and approved by, the Commission has not changed.² Intelsat provides as an attachment hereto the portions of the previously provided Engineering Statement that change as a result of this modification application (*i.e.*, Section 2.3,

¹ 47 C.F.R. § 25.117(c).

² See *Policy Branch Information; Actions Taken*, Report No. SAT- 01086, File Nos. SAT-LOA-20130722-00097 and SAT-AMD-20140718-00087 (May 22, 2015) (Public Notice).

Exhibit 5 and Exhibit 6). To the extent necessary, Intelsat requests a waiver of the requirement to specify the new command frequencies on FCC Form Schedule S,³ providing in Tables 1 and 2 below the only changes to FCC Form Schedule S resulting from this requested modification. The changes are as follows: replace CMD1 – CMD6 with CMD1, CMD2, and CMD3, each of which shows the center frequency of a command frequency range and a bandwidth value that includes the center frequency range plus the carrier bandwidth.

Table 1: Original Command Channels from Schedule S, Table S9

S9. Space Station Channels						
	a. Channel ID	b. Assigned Bandwidth (kHz)	c. T/R Mode	d. Center Frequency (MHz)	e. Polarization	f. TT&C or Comm
	CMD1	1000	R	6422	V	T
	CMD2	1000	R	6422	L	T
	CMD3	1000	R	6424.5	V	T
	CMD4	1000	R	6424.5	L	T
	CMD5	1000	R	5850.5	L	T
	CMD6	1000	R	5853	L	T

Table 2: Requested Modified Command Channels from Schedule S, Table S9

S9. Space Station Channels						
	a. Channel ID	b. Assigned Bandwidth (kHz)	c. T/R Mode	d. Center Frequency (MHz)	e. Polarization	f. TT&C or Comm
	CMD1	3700	R	6423.5	V	T
	CMD2	3700	R	6423.5	L	T
	CMD3	3700	R	5851.75	L	T

³ Strict compliance with the requirement in Section 25.117(c) to file technical information on Schedule S would not support the public interest in this case because the technical information for this satellite at this orbital location is a matter of public record. The only technical information that is changing are the command channels. As such, the burden of completing and filing Schedule S far outweighs any benefit of submitting this information on a form rather than in a narrative.

I. REQUEST FOR MODIFICATION

On May 21, 2015, the Commission authorized the launch and operation of the Intelsat 29e satellite at the 50.0° W.L. orbital location.⁴ That authorization approved command of the Intelsat 29e satellite using two of four channels centered at the frequencies 5850.5 MHz, 5853.0 MHz, 6422 MHz, and 6424.5 MHz. By this modification application, Intelsat seeks authority to operate Intelsat 29e's command channels with center frequencies in the ranges 5850.5 - 5853.0 MHz and 6422 - 6424.5 MHz, selectable via ground command in 100 kHz steps.

Grant of this modification application is in the public interest. Intelsat 29e is the first operational Intelsat Epic^{NG} satellite using an innovative approach to satellite architecture to provide high-throughput, customizable services. The Intelsat 29e satellite has been designed to allow flexibility in the use of frequencies, including the command frequencies. Rather than fixed command signals, command frequencies can be selected from a range of frequencies to avoid interference. Use of the requested command frequency ranges will be consistent with Intelsat's coordination agreements for the nominal 50.0° W.L. location. Grant of this application is in the public interest because it will enable Intelsat to vary its command signals and reduce the possibility of interference for the Intelsat 29e satellite.

II. CONCLUSION

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this modification application to permit Intelsat to operate Intelsat 29e's command channels with center frequencies in the ranges 5850.5 - 5853.0 MHz and 6422 - 6424.5 MHz, selectable via ground command in 100 kHz steps.

⁴ *Supra*, note 2. Intelsat 29e arrived on-station at its licensed orbital location on March 21, 2016. *See* Letter from Susan H. Crandall to Marlene H. Dortch, File No. SAT-LOA-20130722-00097 (Mar. 28, 2016).

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Jennifer D. Hindin
Colleen King
WILEY REIN LLP
1776 K Street, N.W.
Washington, D.C. 20006
(202) 719-7000

September 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.