

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for  
Intelsat 35e (S2959)

File No. SAT-MOD- \_\_\_\_\_

**APPLICATION OF INTELSAT LICENSE LLC**  
**TO MODIFY AUTHORIZATION FOR INTELSAT 35e**

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 35e satellite (Call Sign S2959). Specifically, this modification seeks authority to operate Intelsat 35e’s command channels with center frequencies in the ranges 5850.5-5853.0 MHz and 6422.0-6424.5 MHz, selectable via ground command in 100 kHz steps.

In accordance with the Commission’s rules, this application has been filed electronically as an attachment to FCC Form 312.<sup>2</sup> Intelsat provides the technical information relating to the proposed modification on Schedule S and in narrative form in the attached Engineering Statement.<sup>3</sup> 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 35e satellite already on file with, and approved by, the Commission has not changed.<sup>4</sup>

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<sup>1</sup> 47 C.F.R. § 25.117.

<sup>2</sup> 47 C.F.R. §§ 25.117(b), (c).

<sup>3</sup> See 47 C.F.R. § 25.114.

<sup>4</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01191, File No. SAT-LOA-20160408-00034 (Oct. 7, 2016).

## **I. REQEUST FOR MODIFICATION**

On October 5, 2016, the Commission authorized the launch and operation of Intelsat 35e, a replacement satellite with new frequencies, at the 34.5° W.L. orbital location.<sup>5</sup> That authorization approved command of the Intelsat 35e satellite using two channels centered at the frequencies 5853.0 MHz and 6424.5 MHz (Earth-to-space). By this modification application, Intelsat seeks authority to operate Intelsat 35e's command channels with center frequencies in the ranges 5850.5-5853.0 MHz and 6422.0-6424.5 MHz, selectable via ground command in 100 kHz steps.

Grant of this modification application is in the public interest. Intelsat 35e has been designed to allow flexibility in the use of frequencies, including 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 34.5° W.L. orbital location. Grant of this application is in the public interest because it will enable Intelsat to vary its command signals and thereby reduce the possibility of interference to the Intelsat 35e satellite.

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<sup>5</sup> See *id.* Intelsat 35e arrived on-station at its licensed orbital location on August 16, 2017. See Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat Corporation to Marlene H. Dortch, Secretary, Federal Communications Commission, File No. SAT-LOA-20160408-00034 (Aug. 18, 2017).

## **II. 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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March 20, 2018

## 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>1</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>2</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>1</sup> 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).

<sup>2</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:

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 Connect Finance S.A., a Luxembourg company. Intelsat Connect Finance 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.