

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

File No. SAT-MOD- _____

Application to Modify Authorization for
Intelsat 805 (S2404)

APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR INTELSAT 805

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 805 satellite (call sign S2404). Specifically, this modification application seeks authority to relocate Intelsat 805 to, and operate the satellite at, 169.1° E.L.

In accordance with the Commission’s rules,¹ this application has been filed electronically as an attachment to FCC Form 312. Intelsat provides the technical information relating to the proposed modification on Schedule S and in narrative form, as contained in the attached Engineering Statement, pursuant to Section 25.114 of the Commission’s rules.²

¹ 47 C.F.R. § 25.117(c).

² 47 C.F.R. § 25.114.

I. REQUEST TO RELOCATE INTELSAT 805 TO 169.1° E.L.

Intelsat requests authority to relocate Intelsat 805 to, and operate the satellite at, 169.1° E.L. Intelsat 805 is currently operating at 169.0° E.L.³ Intelsat has been granted thirty days of Special Temporary Authority (“STA”) commencing August 10, 2018,⁴ to drift Intelsat 805 to, and operate the satellite at, 169.1° E.L.; Intelsat will utilize both the satellite’s telemetry, tracking, and command (“TT&C”) frequencies and communication frequencies during the drift. Intelsat has separately filed a 180-day STA request to support this redeployment.⁵

At the nominal 169° E.L location, Intelsat 805 will be nominally co-located with JCSAT-RA (call sign S2960),⁶ and after its successful deployment, with Horizons 3e (call sign S2947). Both Intelsat 805 and JCSAT-RA will support customers at the nominal 169° E.L. location until the arrival of Horizons 3e, which is scheduled for launch later this year.

The chart below illustrates the frequencies that will be used by Intelsat 805 at its new location and by JCSAT-RA and Horizons 3e at the 169.0° E.L. orbital location.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01335, File No. SAT-STA-20180719-00054 (Aug. 3, 2018) (Public Notice).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-MOD-20151020-00072 (Feb. 26, 2016) (Public Notice). In the STA grant, the Commission notes that waiver of condition #19 of the Horizons 3e license is not needed in the instant case because the .1° drift does not raise warehousing concerns. *See id.* at note 1.

⁵ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01333, File No. SAT-STA-20180703-00050 (July 17, 2018) (Public Notice).

⁶ JCSAT-RA is currently drifting from 128.0° E.L. to 169.0° E.L., and is expected to arrive at 169.0° E.L. on August 26, 2018. See *Policy Branch Information; Actions Taken*, Report No. SAT-01330, File No. SAT-LOA-20160411-00035 (July 13, 2018) (Public Notice).

	Intelsat 805 at 169.1° E.L.	JCSAT-RA at 169.0° E.L.	Horizons 3e at 169.0° E.L.
3400-3700 MHz	✓		
3700-3940 MHz	✓		✓
3940-4200 MHz	✓	✓	✓
5850-5925 MHz	✓		
5925-6225 MHz	✓		✓
6225-6425 MHz	✓	✓	✓
6425-6485 MHz	✓	✓	
6485-6650 MHz	✓		
10850-11700 MHz			✓
12200-12250 MHz		✓	✓
12250-12500 MHz		✓	✓
12500-12750 MHz	✓	✓	✓
12920-13250 MHz			✓
13750-13800 MHz			✓
13800-13997 MHz		✓	✓
13997-14000 MHz		✓	✓
14000-14250 MHz	✓	✓	✓
14250-14500 MHz		✓	✓

Intelsat 805's specific TT&C frequencies are as follows: 6173.7 MHz, 6176.3 MHz, and 12198.75 MHz in the uplink; and 3947.5 MHz, 3948.0 MHz, 3950.0 MHz, and 3952.0 MHz in the downlink. Intelsat 805's communications frequencies are: 5850-6650 MHz and 14000-14250 MHz in the uplink; and 3400-4200 MHz and 12500-12750 MHz in the downlink.

During the short relocation of Intelsat 805, Intelsat will utilize both the satellite's TT&C frequencies and communication frequencies, as traffic will remain on the satellite. Intelsat will follow industry practices for coordinating transmissions during the relocation process.

II. PUBLIC INTEREST SHOWING

Grant of this modification application is in the public interest because it will allow Intelsat to safely collocate Intelsat 805 and JCSAT-RA at the nominal 169° E.L. prior to the arrival of Horizons 3e.

Grant of this modification application will not result in increased risk of harmful interference. As noted above, Intelsat will operate the above listed TT&C and communications frequencies during the drift and will follow industry practices for coordinating transmissions during the relocation process. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. During Intelsat 805's drift to, and once at, 169.1° E.L., Intelsat will continue to operate the TT&C frequencies and communications payload in conformance with its coordination agreements concerning the nominal 169° E.L. location and the FCC's rules governing operations vis-à-vis adjacent locations.

III. REQUEST FOR TECHNICAL WAIVER

Intelsat requests that the waiver of Sections 2.106, 25.114(d)(14)(ii), 25.202(a)(1), 25.202(g), 25.210(a)(3), 25.210(i)(1), 25.210(f),⁷ and 25.283(c) of the FCC's rules previously

⁷ Intelsat 805 previously obtained a waiver of Section 25.210(g)(1), which required full frequency reuse. *Supra* n. 4. This requirement is now included in Section 25.210(f).

granted for Intelsat 805⁸ be extended to the satellite at 169.1° E.L to the extent necessary.⁹

IV. **CONCLUSION**

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

Intelsat License LLC

By: /s/ Susan H. Crandall

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August 7, 2018

⁸ See *Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-MOD-20151020-00072 (Feb. 26, 2016) (Public Notice); *see also* Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit, 15 FCC Rcd 15460, 15529 (Appendix C)(2000)(Memorandum Opinion and Order and Authorization), recon. denied, 15 FCC Rcd 25234(2000)(Order on Reconsideration).

⁹ The FCC has revised rules 25.202(g) and 25.210(i)(1) and removed rule 25.210(a)(3).

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 2012, the International Bureau authorized the transfer of control of Intelsat.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 *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, 27 FCC Rcd 5,226 (2012). The transfer of control was fully consummated on June 14, 2018. See Letter from Jennifer D. Hindin, Counsel for Intelsat, to Marlene H. Dortch, FCC, IB Docket No. 11-205 (filed June 14, 2018).

**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 Ventures S.à r.l., a Luxembourg company, which is in turn wholly owned by Intelsat Alliance LP, a Delaware limited partnership. Intelsat Alliance LP is indirectly 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, which in turn is wholly owned by Intelsat Envision Holdings LLC, a Delaware limited liability company. Intelsat Envision Holdings LLC 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, which in turn is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by 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-20180627-00048, SAT-T/C-20180627-00049, SES-T/C-20180627-01430, SES-T/C-20180627-01436, SES-T/C-20180627-01433 (granted June 29, 2018), 0008216564 (granted June 28, 2018) and 0037-EX-TU-2018 (granted June 29, 2018).