

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 (“FCC” or “Commission”),¹ hereby seeks to modify the authorization for the Intelsat 10 satellite (Call Sign S2382).² Intelsat 10 is currently authorized to operate at the 47.5° E.L. orbital location.³ By this modification application, Intelsat seeks to change the satellite’s C-band and Ku-band coverage areas. All other information previously provided for the operation of Intelsat 10 at 47.5° E.L. remains unchanged.⁴

¹ 47 C.F.R. § 25.117.

² Intelsat 10 was formerly known as PAS-10. *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Notification of New Space Station Names (filed Jan. 8, 2007).

³ *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01173, File No. SAT MOD-20160422-00038 (July 8, 2016) (extending the license term of Intelsat 10). To the extent necessary, Intelsat requests that all waivers previously granted to Intelsat 10 continue to apply.

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00976, File No. SAT-MOD-20130322-00052 (Oct. 25, 2013) (Public Notice) (“Intelsat 10 Modification”).

Specifically, this application seeks authority to modify the licensed operational areas for the satellite's C- and Ku-band beams to include multiple boresights on the four mechanically adjustable reflectors.⁵ Grant of this modification application will serve the public interest by allowing Intelsat to meet on-going and future customer requirements at 47.5° E.L. in an expeditious manner.

Additionally, Intelsat notifies the Commission that it now expects to dispose of the spacecraft by moving it to a planned minimum altitude of 150 kilometers (perigee) above the geostationary arc.⁶ Further discussion of post mission disposal is provided in the accompanying Engineering Statement.

In accordance with the requirements of the Commission's rules,⁷ 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 in the attached Engineering Statement.

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

⁵ The proposed coverages in this application include the coverage areas that Intelsat 10 is currently operating in pursuant to Special Temporary Authority. *See Satellite Policy Branch Information; Actions Taken*, Report No. 01411, File No. SAT-STA-20190823-00080 (Sept. 6, 2019) (Public Notice).

⁶ In 2013, Intelsat stated that it expected to de-orbit the Intelsat 10 satellite to an altitude of 300 km. *See Intelsat 10 Modification*, Engineering Statement at 8. As the Commission is aware, because there is no mechanism for precisely calculating the amount of fuel left on the spacecraft once it is in orbit, it is possible that the spacecraft will not meet the planned minimum de-orbit altitude.

⁷ 47 C.F.R. § 25.117(b), (c).

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

Jennifer D. Hindin
Madeleine M. Lottenbach
WILEY REIN LLP
1776 K Street, N.W.
Washington, D.C. 20006

Susan H. Crandall
Associate General Counsel
Intelsat US LLC

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

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Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved Intelsat's ownership structure, including foreign ownership.¹ There have been no material changes to Intelsat's ownership since the *2018 Pro Forma*.

¹ 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 22151 (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) ("*2018 Pro Forma*").

Exhibit B

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:

David Tolley, Chairman
José Toscano, Deputy Chairman
Michelle Bryan, Secretary
Mirjana Hervy, Director, Finance

Board of Managers:

David Tolley
José Toscano
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 indirectly wholly owned by Intelsat S.A. Specifically, Intelsat License LLC 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. is a publicly traded company. With the exception of BC Partners Holdings Limited (“BCP”), described below, no person or entity holds a ten percent or greater ownership interest in Intelsat S.A. as of July 30, 2019.

Name: BCP
Address: Heritage Hall, Le Marchant Street, St Peter Port, Guernsey, Channel Islands
Citizenship: Guernsey
Indirect Interest: Approximately 39-40%¹

¹ The exact indirect interest held by BCP is subject to fluctuation as Intelsat S.A.’s stock is publicly traded.