

File # SAT-MOD-20200326-00028



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File Number: SAT-MOD-20200326-00028

Call Sign S2406 Grant Date August 6, 2020
(or other identifier) Term Dates
From August 6, 2020 To: April 30, 2024
Approved: J.W. Whalen
*John W. Whalen
acting Chief Policy Branch
Satellite Policy Branch*

Approved by OMB
3060-0678

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM

FCC 312 MAIN FORM FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Modification of authorization for Intelsat 902 (Call Sign S2406) to redeploy to 50.1 W.L. and extend license term

1-8. Legal Name of Applicant

Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA		Fax Number:	703-559-8539
Name:			
Street:	c/o Intelsat US LLC	E-Mail:	susan.crandall@intelsat.com
	7900 Tysons One Place		
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:	Susan H. Crandall		

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IBFS File No(s):	SAT-MOD-20200326-00028	G R A N T E D – With Conditions  International Bureau Satellite Division
Licensee/Grantee:	Intelsat License LLC, as debtor-in-possession	
Call Sign:	S2406	
Satellite Name:	Intelsat 902	
Orbital Location: (required station-keeping tolerance)	50.1° W.L. (+/- 0.05 degrees east-west station keeping)	
Administration:	United States of America Papua New Guinea (ITU) ¹	
Nature of Service:	Fixed-Satellite Service (FSS)	
Scope of Grant:	Authority to modify the authorization for the Intelsat 902 space station to specify operations at the 50.1° W.L. orbital location, instead of Intelsat 902's currently authorized location of 62.0° E.L., to provide FSS. Authority to conduct telemetry, tracking and command (TT&C) operations necessary to drift Intelsat 902 from 62.0° E.L. to 50.1° W.L. and to maintain Intelsat 902 at 50.1° W.L. in inclined orbit. ² The Intelsat 902 license term is extended through April 30, 2024.	
Previous Grant(s):	IBFS File No. SAT-LOA-20000119-00020, grant by Memorandum Opinion Order and Authorization, FCC 00-287 (released Aug. 8, 2000); IBFS File No. SAT-MOD-20010509-00038, grant by Order and Authorization, DA 01-2069 (rel. Sept. 4, 2001); IBFS File No. SAT-MOD-20160816-00084, grant stamp, November 3, 2016.	
Service Area(s):	See Schedule S Tech Report and Engineering Statement at 1.	
Frequencies:	3625-4200 (space-to-Earth) 5850-6425 MHz (Earth-to-space) 10.95-11.2 GHz (space-to-Earth) 11.45-11.7 GHz (space-to-Earth) 14.0-14.5 GHz (Earth-to-space) TT&C: 3947.5 MHz; 3948.0 MHz; 3952.0 MHz; 3952.5 MHz (space-to-Earth) 6173.7 MHz, 6176.3 MHz (Earth-to-space)	
Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:		
<ol style="list-style-type: none"> 1. Intelsat must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat will be held responsible for all cost-recovery fees associated with ITU filings. No protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, coordination agreements are successfully completed. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required 		

¹ Intelsat states that Intelsat 902 will operate in the 3625-3700 MHz frequency band under ITU network filing NEW DAWN 35-1 held by the Administration of Papua New Guinea. Engineering Statement at 5.

² Narrative at 1, n.2. Intelsat 902 commenced inclined orbit operations in 2019. See Letter from Cynthia J. Grady, Assistant Senior Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission (dated Oct. 23, 2019), available in IBFS File No. SAT-MOD-20160816-00084.

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- to effect coordination of the frequency assignments of other administrations. *See* 47 CFR § 25.111.
2. All operations during the drift of Intelsat 902 to the 50.1° W.L. orbital location must be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating stations. In the event of any harmful interference, Intelsat shall cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
 3. Intelsat must coordinate the operations of Intelsat 902 with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 50.1° W.L. orbital location.
 4. Intelsat must operate only the TT&C frequencies on Intelsat 902 during the space station's drift from 62.0° E.L. to 50.1° W.L.
 5. Intelsat must operate Intelsat 902 at the 50.1° W.L. orbital location in accordance with any existing or future coordination agreements for this location. In the absence of a coordination agreement, such operations must comply with applicable provisions of the ITU Radio Regulations as the Commission cannot guarantee the success of the required coordination.
 6. In connection with the provisions of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
 7. While at the 50.1° W.L. orbital location, Intelsat must maintain the Intelsat 902 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
 8. Intelsat's use of the 3625-3650 MHz (space-to-Earth) frequency band is subject to footnote US107, which limits FSS operations within the United States in the 3600-3650 MHz band on a primary basis to earth stations authorized prior to, or granted as a result of an application filed prior to, July 23, 2015 and constructed within 12 months of initial authorization. Additionally, applications filed after July 23, 2015 to modify these earth stations will not be accepted except for changes in polarization, antenna orientation, or ownership; and increases in antenna size for interference mitigation purposes. All other FSS earth station operations in the 3625-3650 MHz band must be on a secondary basis.
 9. Intelsat's use of the 3600-3650 MHz (space-to-Earth) frequency band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 CFR § 2.106, US245, which states that, in the 3600-3650 MHz band, use of the non-Federal FSS is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.
 10. Intelsat's use of the 3650-3700 MHz (space-to-Earth) frequency band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 CFR § 2.106, NG185, which states that, in the 3650-3700 MHz band, use of the non-Federal FSS is limited to international inter-continental systems.
 11. Intelsat's use of the 3650-3700 MHz (space-to-Earth) frequency band is subject to footnote NG169 of the United States Table of Frequency Allocations, which states that after December 1, 2000, operations on a primary basis by the FSS (space-to-Earth) in the 3650-3700 MHz band must be limited to grandfathered earth stations. All other FSS earth station operations in the band 3650-3700 MHz must be on a secondary basis.
 12. The operations of Intelsat 902 in the 3700-4200 MHz band, within the contiguous United States, are subject to the terms of the *3.7-4.2 GHz Report and Order* (FCC 20-22), including Section 2.106, footnote NG182 and footnote NG457A, future actions in the proceeding, and actions on delegated authority taken in accordance with the Commission's Order (*See, e.g.*, Public Notice DA 20-578, released June 1, 2020, announcing accelerated clearing in the 3.7 – 4.2 GHz band).
 13. Use of the 5850-5925 MHz (Earth-to-space) frequency band must comply with the terms of footnote US245 to the U.S. Table of Frequency Allocations, 47 CFR § 2.106, US245, and Section 2.108 of the

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Commission's rules, 47 CFR § 2.108, which states that, in the 5850-5925 MHz band, use of the non-Federal FSS is limited to international, intercontinental satellite systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat must not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.

14. Intelsat's operations of Intelsat 902 at the 50.1° W.L. orbital location in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands are subject to the following additional conditions:
 - a. Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
 - b. No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.
15. The U.S. Administration will not object to the use of the Intelsat 902 satellite by the Papua New Guinea Administration for claiming bringing into use or continuing the use of the NEW DAWN 35-1 ITU filing at 50.1° W.L. in the 3625-3700 MHz frequency band.
16. The operations of Intelsat 902 and associated earth stations must comport with the applicable uplink and downlink limits in 47 CFR § 25.140(a)(3) of the Commission's rules, unless Intelsat coordinates any non-conforming operations with the operations of U.S.-licensed geostationary orbit space stations within 6 degrees of the 50.1° W.L. orbital location. Intelsat must also comport with the maximum power limits indicated in existing or future coordination agreements at 50.1° W.L. Non-conforming operation must also be coordinated with respect to those operations of non-U.S.-licensed space stations within 6 degrees of 50.1° W.L. involving approved communications with U.S.-licensed earth stations.
17. The power flux-density (PFD) at the Earth's surface produced by the emissions from the Intelsat 902 space station, in the 3700-4200 MHz and 11.45-11.7 GHz frequency bands (space-to-Earth), must not exceed the applicable power flux-density limits contained in No.21.16 in Article 21 of the ITU Radio Regulations.
18. Intelsat 902's operations in the 5925-6425 MHz and 14-14.5 GHz (Earth-to-space) bands are subject to No. 5.457A of the ITU Radio Regulations; which states that earth stations located on board vessels may communicate with space stations of the fixed-satellite service. Such use shall be in accordance with Resolution 902 (WRC-03).
19. Intelsat's request for waiver of footnote NG52 of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, NG52, to use the 10.95-11.2 GHz and 11.45-11.7 GHz bands to offer domestic services on an unprotected, non-harmful interference basis in the United States IS GRANTED, as conditioned. We find that waiver does not undermine the purpose of the rule because the waiver involves only earth stations that are receive-only in the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands and thus are not capable of causing interference into fixed stations operating in this band. Furthermore, because Intelsat has agreed to accept any level of interference from fixed stations into receive earth stations in this band, fixed station operators will not be required to coordinate their station operations with Intelsat's earth stations' operations.³ Under these circumstances, we determine that an additional coordination burden is

³ See Legal Narrative at 9-10.

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not placed upon fixed station operators and their ability to expand service in the future would not be restricted in any manner.⁴

- a. Intelsat's space-to-Earth transmissions in the 10.95-11.2 GHz and 11.45-11.7 GHz bands are to be conducted without interference protection from fixed stations to earth stations receiving these transmissions. This applies to fixed stations to which frequencies in the 10.95-11.2 GHz and 11.45-11.7 GHz bands have either been already assigned, or to which frequencies in the 10.95-11.2 GHz and 11.45-11.7 GHz bands may be assigned at a later date.
- b. Intelsat must inform its customers, in writing, including end-users receiving service from resellers accessing capacity on the Intelsat 902 space station, that domestic service in the 10.95-11.2 GHz and 11.45-11.7 GHz bands is being provided on an unprotected basis, and that the potential exists that future licensed fixed stations may cause harmful interference to unprotected receive earth stations in the 11.45-11.7 GHz band.
20. Intelsat's use of the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands is subject to footnote US211 to the United States Table of Frequency Allocations, 47 CFR § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.
21. Operations of Intelsat 902 in the 14.47-14.5 GHz (Earth-to-space) frequency band is subject to the terms of footnotes 5.149 and US342 to the United States Table of Frequency Allocations, 47 CFR § 2.106, 5.149, US342, which urge applicants to take all practicable steps to protect the radio astronomy service from harmful interference.
22. Intelsat's request that the prior waivers granted to Intelsat 902 for Sections 25.140(a)(2) and 25.202(g) of the Commission's rules be extended to the operation of Intelsat 902 at 50.1° W.L. is GRANTED, subject to the conditions in the prior grants.⁵
23. Prior to commencing operations with the Intelsat 902 space station, Intelsat must file with the Commission the information required by section 25.172 of the Commission's rules, 47 CFR § 25.172.
24. The license term for the Intelsat 902 space station is extended from September 30, 2022, through April 30, 2024.
25. Upon expiration of the license term, Intelsat is responsible for the proper disposal of Intelsat 902 by moving it to a minimum altitude of 150 kilometers above the geostationary arc.
26. Within 30 days of completion of the end-of-life maneuvers, Intelsat shall send a letter to the Chief, Satellite Division, International Bureau, indicating the apogee and perigee of the Intelsat 902 disposal orbit.

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

⁴ *PanAmSat Licensee Corp. Application for Authority to Use the Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642, 14646 (Sat. Div., Int'l Bur., 2005).

⁵ See IBFS File No. SAT-MOD-20160816-00084, grant stamp, November 3, 2016; *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 (Int'l Bur., Sat. & Rad. Div. 2001) (IBFS File No. SAT-MOD-20010509-00038). See also *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*, Memorandum Opinion Order and Authorization, 15 FCC Rcd 15460 (2000) (IBFS File No. SAT-LOA-20000119-00019).

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This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	August 6, 2020	
Term Dates	From: August 6, 2020	To: April 30, 2024
Approved:  John W. Whaley Acting Chief, Satellite Policy Branch		

9–16. Name of Contact Representative

Name:	Cynthia J. Grady	Phone Number:	703–559–6949
Company:	Intelsat US LLC	Fax Number:	703–559–8539
Street:	7900 Tysons One Place	E-Mail:	cynthia.grady@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102–5972
Attention:		Relationship:	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
(N/A) b2. Application for Registration of New Domestic Receive–Only Station
 b3. Amendment to a Pending Application
 b4. Modification of License or Registration
b5. Assignment of License or Registration
b6. Transfer of Control of License or Registration
 b7. Notification of Minor Modification
(N/A) b8. Application for License of New Receive–Only Station Using Non–U.S. Licensed Satellite
(N/A) b9. Letter of Intent to Use Non–U.S. Licensed Satellite to Provide Service in the United States
(N/A) b10. Other (Please specify)

- (N/A) b11. Application for Earth Station to Access a Non–U.S. satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States
(N/A) b12. Application for Database Entry
 b13. Amendment to a Pending Database Entry Application
 b14. Modification of Database Entry

17c. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
17d.	
<p style="text-align: center;">Fee Classification BFY – Space Station Modification(Geostationary)</p>	
18. If this filing is in reference to an existing station, enter:	
(a) Call sign of station: S2406	
19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:	
(a) Date pending application was filed:	
(b) File number: SATMOD2016081600084	

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier
- Non-Common Carrier

22. If earth station applicant, check all that apply.

- Using U.S. licensed satellites
- Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network
- Not connected to a Public Switched Network
- N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)
- b. Ku-Band (12/14 GHz)
- c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive
- Transmit-Only
- Receive-Only
- N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a — authorization to add new emission designator and related service
- b — authorization to change emission designator and related service
- c — authorization to increase EIRP and EIRP density
- d — authorization to replace antenna
- e — authorization to add antenna
- f — authorization to relocate fixed station
- g — authorization to change frequency(ies)
- h — authorization to add frequency
- i — authorization to add Points of Communication (satellites & countries)
- j — authorization to change Points of Communication (satellites & countries)
- k — authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l — authorization to change orbit location
- m — authorization to perform fleet management
- n — authorization to extend milestones
- o — Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?

Yes No

30. Is the applicant an alien or the representative of an alien?

Yes No N/A

31. Is the applicant a corporation organized under the laws of any foreign government?

Yes No N/A

32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

<p>33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
<p>34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.</p>	
BASIC QUALIFICATIONS	
<p>35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<p>36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<input type="radio"/> Yes <input checked="" type="radio"/> No

<p>37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
<p>38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
<p>39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
<p>40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.</p>	

<p>41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<p>42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<p>42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?</p>	
<p>43. Description. (Summarize the nature of the application and the services to be provided. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)</p> <p>Intelsat License LLC seeks to modify the authorization for Intelsat 902 (call sign S2406) to redploy to, and operate in inclined orbit at, 50.1 W.L., and to extend the license term through April 30, 2024.</p>	<input type="checkbox"/> Narrative

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

B

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

B

C

Eng Stmt

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Cynthia J. Grady



46. Title of Person Signing
Senior Counsel, Intelsat US LLC

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.