

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 901 (Call Sign S2405)

File No. SAT-MOD-_____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR INTELSAT 901**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.117 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ hereby seeks to modify the authorization for Intelsat 901 (Call Sign S2405). Specifically, Intelsat seeks to (i) modify the satellite’s beam coverage; and (ii) extend the license term through February 28, 2025.

In accordance with the Commission’s rules, 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 incorporates by reference the Engineering Statement filed as part of Intelsat’s 2019 modification application.²

¹ 47 C.F.R. § 25.117.

² See Application to Modify Authorization for Intelsat 901, Engineering Statement, File No. SAT-MOD-20190207-00009 (granted June 20, 2019) (seeking authority to raise the Intelsat 901 to 300 km above the geostationary arc; to dock with MEV-1 (Call Sign S2990); and to redeploy Intelsat 901, as a combined vehicle stack (“CVS”) with MEV-1, to, and operate at 27.5° W.L.) (“IS-901 Modification”).

Consistent with Section 1.62 of the Commission's rules,³ Intelsat will continue to operate the Intelsat 901 satellite pursuant to the terms and conditions of its expiring license until the Commission acts on this request.

I. REQUEST FOR NEW BEAM COVERAGES

Intelsat seeks to modify the Intelsat 901 coverage area by biasing the platform to 0.60°W, 0.15°N. On March 27, 2020, Intelsat was granted special temporary authority for 60 days to operate the Intelsat 901 satellite on the proposed platform bias while this modification is pending.⁴ The proposed platform bias of Intelsat 901 will allow Intelsat to replace Intelsat 907 (Call Sign S2411), which currently operates at 27.5° W.L. using similar coverage areas as requested herein.⁵ The replacement of Intelsat 907 with Intelsat 901 ensures better customer service continuity at 27.5° W.L. and, accordingly, is in the public interest. After the traffic transfer from Intelsat 907 to Intelsat 901 is complete, Intelsat 907 will be deorbited. The specifics of the new coverage area are addressed in the accompanying Schedule S.

³ 47 C.F.R. § 1.62.

⁴ See Intelsat License LLC, Request for Special Temporary Authority, Stamp Grant, File No. SAT-STA-20200310-00025 (Mar. 27, 2020).

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01299, File No. SAT-MOD-20171023-00142 (Jan. 26, 2018). Per Section 25.140(d)(4) of the Commission's rules, Intelsat 901 will operate within the same coordinated, non-routine, transmission levels as Intelsat 907. See 47 C.F.R. 25.140(d)(4); Letter from Susan H. Crandall, Intelsat Corporation, to Ms. Marlene H. Dortch, Federal Communications Commission, File No. SAT-MOD-20020918-00183 (Sept. 19, 2016).

II. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to further extend the license term for the Intelsat 901 satellite through February 28, 2025. The Intelsat 901 satellite is licensed to operate at 27.5° W.L.⁶ and was placed into service on November 21, 2001.⁷ In 2016, the Commission granted Intelsat a five-year license extension and accordingly, the current license term for Intelsat 901 will expire on December 31, 2021.⁸

In February 2020, Intelsat 901 and MEV-1⁹ successfully docked above the geostationary orbit¹⁰ and the two spacecraft are currently in the process of redeploying to 27.5° W.L. as a combined vehicle stack (“CVS”). MEV-1 is performing, and will continue to perform, the station keeping and attitude control functions for Intelsat 901.¹¹ From the time of docking, the activities performed by MEV-1 will further extend Intelsat 901’s expected end of service life by an additional five years—revising the new estimated end of service life to February 28, 2025. To

⁶ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (June 21, 2019).

⁷ See Letter from Jennifer D. Hindin, Counsel for Intelsat LLC, to Ms. Magalie Roman Salas, FCC, File No. SAT-MOD-20010509-00037 (Nov. 27, 2001).

⁸ 47 C.F.R. § 25.121(b); see *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01199, File No. SAT-MOD-20160906-00088 (Nov. 4, 2016) (Public Notice).

⁹ See *Policy Branch Information; Actions Taken*, Report No. SAT-01397, File Nos. SAT-LOA-20170224-00021 and SAT-AMD-20190207-00008 (Dec. 8, 2017) (Public Notice).

¹⁰ See Northrop Grumman Successfully Completes Historic First Docking of Mission Extension Vehicle with Intelsat 901 Satellite, Feb. 26, 2020, (Feb. 26, 2020) *available at*: <http://www.intelsat.com/news/press-release/northrop-grumman-successfully-completes-historic-first-docking-of-mission-extension-vehicle-with-intelsat-901-satellite/>.

¹¹ As part of the CVS Intelsat will utilize only the satellite’s telemetry, tracking, and command (“TT&C”) frequencies for telemetry, health monitoring, and payload commanding. Intelsat will not engage in any station-keeping or attitude control maneuvers. See *IS-901 Modification*, at Condition 5.

the extent the satellite's projected end of service life is extended in the future, Intelsat will seek an additional extension of the license term.

III. PUBLIC INTEREST SHOWING

Grant of this application to modify the satellite's beam coverage and extend the license term would serve the public interest by enabling customers to continue receiving service from the 27.5° W.L. orbital location, with the same coverage, after the deorbit of Intelsat 907.

Furthermore, grant of the license term extension request will allow Intelsat to maximize the use of Intelsat 901, which has more than a year of useful life remaining beyond the current license term's December 31, 2021 expiration date. Moreover, the license extension will allow Intelsat to demonstrate the mission extending capabilities of MEV-1.

The Intelsat 901 satellite's subsystems and solar panels are functioning normally, and there are no single points of failure on Intelsat 901 that would result in an inability to de-orbit the satellite. Further, the satellite's TT&C functions are operating normally and most of the payload is operational. Extending the license term will promote the continued efficient use of orbital resources and is consistent with prior decisions by the Commission to extend satellite license terms.¹²

¹² See e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice) (granting license extension for Galaxy 11, based on the satellite's current projected end of service).

IV. CONCLUSION

For the reasons set forth above, Intelsat respectfully requests that the Commission grant this modification application to change Intelsat 901's coverage area and further extend the satellite's license term through February 28, 2025.

Respectfully submitted,

Intelsat License LLC

By: /s/ Susan H. Crandall

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April 2, 2020

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:

<u>Officers:</u>	<u>Board of Managers:</u>
David Tolley, Chairman	David Tolley
José Toscano, Deputy Chairman	José Toscano
Michelle Bryan, Secretary	Michelle Bryan
Mirjana Hervy, Director, Finance	

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 managed by one general partner and two limited partners—Intelsat Genesis GP LLC, Intelsat Genesis Inc, and Intelsat Jackson Holdings S.A., respectively. Intelsat Genesis GP LLC is a Delaware limited liability company, which is a wholly owned subsidiary of Intelsat Genesis Inc., a Delaware corporation. Intelsat Genesis Inc. is a wholly owned subsidiary of 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. To the best of Intelsat's knowledge, and 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 March 1, 2020.

Name: BCP
Address: Heritage Hall, Le Marchant Street, St Peter Port, Guernsey, Channel Islands
Citizenship: Guernsey
Indirect Interest: Approximately 34%¹

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