

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC, as debtor in possession

Application to Modify Authorization for
Galaxy 12 (S2422)

File No. SAT-MOD-_____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR GALXY 12**

Intelsat License LLC, as debtor in possession (“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 Galaxy 12 satellite (Call Sign S2422). Galaxy 12 is currently authorized to operate at the 129.0° W.L. (231.0° E.L.) orbital location.² By this modification application, Intelsat seeks to change the satellite’s C-band coverage areas on a seasonal basis. All other information previously provided for the operation of Galaxy 12 at 129.0° W.L. remains unchanged.³

Specifically, this application seeks authority to bias the satellite seasonally in order to obtain different C-band coverages. The Galaxy 12 satellite currently operates its C-band beams

¹ 47 C.F.R. § 25.117.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01311, File No. SAT-MOD-20180215-00017 (Apr. 20, 2018) (Public Notice). To the extent necessary, Intelsat requests that the waiver of 47 C.F.R. § 25.283(c), previously granted to Galaxy 12, continue to apply.

³ *Id.*

on a seasonal bias under Special Temporary Authority.⁴ In this application, Intelsat requests Commission approval to continue seasonal C-band bias operations through license modification.⁵ Grant of this modification application will serve the public interest by allowing Intelsat to meet ongoing customer requirements, which change seasonally, at 129.0° W.L. in an expeditious manner.

In accordance with the requirements of the Commission's rules,⁶ 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.

⁴ See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01492 File No. SAT-STA-20200812-00096 (Aug. 21, 2020) (Public Notice).

⁵ The proposed coverages in this application include the summer season (approximately May – October) coverage areas that Galaxy 12 is currently operating in pursuant to Special Temporary Authority, *see id.*, as well as new coverage areas for the winter season (approximately November-April). The summer and winter coverage maps are contained in Exhibits 5 and 6, respectively, of the Engineering Statement.

⁶ 47 C.F.R. § 25.117(b), (c).

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

Jennifer D. Hindin
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

September 9, 2020

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).

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 and Intelsat License LLC, as debtor in possession, 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 and Intelsat License LLC, as debtor in possession, officers and members of the Board of Managers is 4, rue Albert Borschette L-1246 Luxembourg.

Intelsat License LLC and Intelsat License LLC, as debtor in possession, are Delaware limited liability companies that are indirectly wholly owned by Intelsat S.A. Specifically, Intelsat License LLC and Intelsat License LLC, as debtor in possession, are 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 by 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 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. 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 April 28, 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.