

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of

Intelsat License LLC, as debtor in possession

Application to Modify Authorization for  
Intelsat 904 (S2408)

File No. SAT-MOD-\_\_\_\_\_

**APPLICATION OF INTELSAT LICENSE LLC  
TO MODIFY AUTHORIZATION FOR INTELSAT 904**

Intelsat License LLC, as debtor in possession (“Intelsat”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> hereby seeks to modify the authorization for the Intelsat 904 satellite (S2408). Intelsat 904 is currently authorized to operate at the 29.5° W.L. (330.5° E.L.) orbital location.<sup>2</sup> By this modification application, Intelsat seeks to bias the satellite platform to obtain new C-band coverage.<sup>3</sup> All

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<sup>1</sup> 47 C.F.R. § 25.117.

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (Aug. 2, 2019) (Public Notice). To the extent necessary, Intelsat requests that all waivers previously granted to Intelsat 904 continue to apply.

<sup>3</sup> The Commission’s rules permit satellite modification applications in the 3700-4200 MHz band. See 47 C.F.R. § 2.106 NG182 (“In the band 3700-4200 MHz ... [a]pplications for extension, cancellation, replacement, or modification of existing space station authorizations in the band will continue to be accepted and processed normally.”); *International Bureau Announces Temporary Filing Freeze on New Fixed-Satellite Service Space Station Applications in the 3.7-4.2 GHz Band*, Public Notice, DA 18-640, 33 FCC Rcd 6119 (2018) (“The freeze does not apply to applications for modification of existing authorizations, relocations of existing space stations pursuant to the Commission’s fleet management policy, or to applications for replacement space stations.”); see also *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*,

other information previously provided for the operation of Intelsat 904 at 29.5° W.L. remains unchanged.<sup>4</sup>

Specifically, this application seeks authority to modify the platform bias to change the coverage of the satellite's eight C-band beams.<sup>5</sup> Grant of this modification application will serve the public interest by allowing Intelsat to meet on-going and future customer requirements at 29.5° W.L. in an expeditious manner.

In accordance with the requirements of the Commission's rules,<sup>6</sup> 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.

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Report and Order and Order of Proposed Modification, FCC 20-22, 35 FCC Rcd 2343, ¶ 115 n. 327 (2020).

<sup>4</sup> On May 13, 2020, Intelsat S.A.—the ultimate parent of Intelsat—and thirty-four of its subsidiaries, including Intelsat, each commenced a voluntary case under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia (Case No. 20-32299 (KLP)). Subsequently, in connection with the Chapter 11 cases, the subsidiaries of Intelsat S.A. holding FCC licenses or authorizations, including Intelsat, filed for pro forma assignment and transfer of control of those licenses to their respective debtors, as debtors-in-possession. *See, e.g.*, Application for Pro Forma Assignment of Intelsat License LLC's Space Station Authorizations, IBFS File No. SAT-ASG-20200522-00048 (granted June 3, 2020). There are no other changes to the corporate structure of Intelsat.

<sup>5</sup> The proposed coverages in this application include the coverage areas that Intelsat 904 is currently operating in pursuant to Special Temporary Authority. The Ku-band beams are steerable and, therefore, unaffected by the platform bias. *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01479, File No. SAT-STA-20200513-00045 (July 2, 2020) (Public Notice).

<sup>6</sup> 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  
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

September 18, 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*.<sup>1</sup> In 2012, the International Bureau authorized the transfer of control of Intelsat.<sup>2</sup> There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

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<sup>1</sup> *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).

<sup>2</sup> *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% <sup>1</sup>

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