

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 25 (S2154)

File No. SAT-MOD-_____

APPLICATION TO MODIFY AUTHORIZATION FOR GALAXY 25

Intelsat License LLC, as debtor in possession (“Intelsat”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”),¹ hereby seeks to modify the authorization for the Galaxy 25 satellite (S2154).² Specifically, this modification seeks authority to operate Galaxy 25 in inclined orbit at 32.9° E.L. (327.1° W.L.).³

¹ 47 C.F.R. § 25.117.

² The Commission’s rules permit modification applications in the 3700-4200 MHz band and these applications are not subject to the FCC’s 2018 filing freeze on new fixed satellite service space station applications. *See* 47 C.F.R. § 2.106 n. 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*, Report and Order and Order of Proposed Modification, FCC 20-22, 35 FCC Rcd 2343, ¶ 115 n. 327 (2020) (“*C-band Order*”).

³ Galaxy 25 began inclined orbit operations in 2018. *See* Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20161004-00097 (Mar. 23, 2018).

In accordance with the Commission's rules, this application has been filed electronically as an attachment to FCC Form 312.⁴ Intelsat provides the technical information relating to the proposed modification on Schedule S and in narrative form in the attached Engineering Statement.⁵

I. REQUEST TO RELOCATE AND OPERATE GALAXY 25 TO 32.9° E.L.

Intelsat requests authority permanently to relocate Galaxy 25 to, and operate the satellite in inclined orbit at, 32.9° E.L. Galaxy 25 is licensed to operate at 93.1° E.L.⁶ but is currently operating at the 32.9° E.L. orbital location pursuant to Special Temporary Authority ("STA").⁷

At the 32.9° E.L. location, Galaxy 25 will be nominally co-located with Intelsat 28 (S2751), which is licensed to operate at 32.8° E.L.⁸ The chart below illustrates the frequencies used by both satellites.

⁴ 47 C.F.R. §§ 25.117(b), (c).

⁵ See 47 C.F.R. § 25.114.

⁶ See *Application of Intelsat License LLC to Modify Authorization for Galaxy 25*, File No. SAT-MOD-20161004-00097 (granted Dec. 8, 2016).

⁷ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01517, File No. SAT-STA-20201008-00123 (Dec. 11, 2020) (Public Notice).

⁸ See *Application of Intelsat New Dawn Company, Ltd. to Modify Authorization for New Dawn*, File No. SAT-MOD-20101029-00228 (granted Mar. 28, 2011).

	Galaxy 25 at 32.9° E.L.⁹	Intelsat 28 at 32.8° E.L.¹⁰
3700-4200 MHz	✓	
5925-6425 MHz	✓	
10.95-11.2 GHz		✓
11.45-11.7 GHz		✓
14.0-14.5 GHz		✓

Galaxy 25's specific telemetry, tracking, and control ("TT&C") frequencies are as follows:

5926.5 MHz and 6423.5 MHz in the uplink; and 4195.5 MHz, and 4199.5 MHz in the downlink.

II. PUBLIC INTEREST SHOWING

Grant of this modification application permanently to relocate Galaxy 25 is in the public interest because it will allow Intelsat to continue providing additional capacity for customers at the nominal 33° E.L. orbital location, where the satellite has been operating since September 9, 2019.

Grant of this relocation request will not result in an increased risk of harmful interference. As noted above, Galaxy 25 is already operating at 32.9° E.L. pursuant to STA. Intelsat will continue to operate the satellite's communications payload and TT&C frequencies at 32.9° E.L. in conformance with applicable coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

⁹ While Galaxy 25 is capable of operating in the 11.7-12.2 GHz and 14.0-14.5 GHz bands, Intelsat is not seeking to operate in Ku-band at 32.9° E.L.

¹⁰ As the Commission is aware, the west antenna reflector on Intelsat 28 did not deploy following launch and, as a result, the C-band payload cannot be utilized. *See* Letter from Susan H. Crandall, Assistant General Counsel, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20101029-00228 (July 14, 2011).

III. REQUEST FOR GRANT WITHOUT MILESONES OR A BOND

Because Galaxy 25 is already in-orbit and operating, grant of this modification application is not subject to milestone conditions, and Intelsat is not required to post a bond under Sections 25.164(a) and 25.165 of the Commission's rules.¹¹

IV. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Galaxy 25 at 32.9° E.L. will be conditioned as follows:

- 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.
- 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.¹²

¹¹ See 47 C.F.R. §§ 25.164(a) and 25.165.

¹² See *Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended*, Order of Modification, 23 FCC Rcd 2764, 2769-71 ¶¶ 11-13 (2008).

V. CONCLUSION

Based on the foregoing, Intelsat respectfully requests that the Commission grant this modification application.

Respectfully submitted,

Intelsat License LLC

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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.