

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 11 (S2237)

File No. SAT-MOD- _____

APPLICATION TO MODIFY AUTHORIZATION FOR INTELSAT 11 (S2237)

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 the Intelsat 11 satellite (Call Sign S2237), a C- and Ku-band satellite operating in inclined orbit at 43.0° W.L.² Specifically, this modification application seeks authority to extend the license term of Intelsat 11 through March 15, 2025, and to operate with revised beam coverage.³

¹ 47 C.F.R. § 25.117.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00617, File No. SAT-MOD-20090108-00004 (July 10, 2009) (Public Notice) (“*Intelsat 11 Authorization*”).

³ The Commission’s rules permit extension and 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).

In accordance with the requirements of the Commission's rules,⁴ this application has been filed electronically as an attachment to FCC Form 312. Intelsat provides updated technical information in the Engineering Statement, Schedule S, and GXT files. All other information provided in previous applications remains unchanged and is incorporated by reference. Intelsat requests that previously granted technical waivers continue to apply to the extent necessary under current rules.⁵ Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate Intelsat 11 pursuant to the terms and conditions of its expiring license until such time as the Commission makes a determination with respect to this request.⁶ Additionally, Intelsat will operate Intelsat 11 in accordance with the Commission's C-band Order and Footnote NG182 of the U.S. Table of Frequency Allocations.⁷

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to extend the license term for the Intelsat 11 satellite through March 15, 2025. Intelsat 11 was placed into service on January 15, 2008,⁸ and began inclined orbit operations on October 2, 2022.⁹ In accordance with the terms of its FCC authorization, the

⁴ 47 C.F.R. § 25.117(c).

⁵ Due to rule changes since 2007, waiver extensions for Sections 25.210(i), 25.210(a)(3), or 25.114(d)(3) of the Commission's rules are no longer necessary. 47 C.F.R. §§ 25.210, 25.114. Intelsat requests extension of the waiver of Section 28.283(c). 47 C.F.R. § 25.283(c).

⁶ 47 C.F.R. § 1.62.

⁷ Intelsat has sought reconsideration to allow its continued access to 500 MHz at its consolidated international TT&C/gateway sites on a protected basis to ensure C-band service continuity to customers on its international C-band satellites. *See* Intelsat License LLC Petition for Reconsideration, GN Docket No. 18-122 (May 26, 2020).

⁸ *See* Letter from Susan H. Crandall, Assistant General Counsel, Intelsat Corporation, to Ms. Marlene H. Dortch, FCC, File No. SAT-MOD-20070207-00027 (Feb. 7, 2008) (certifying that the Intelsat 11 satellite had been successfully placed into orbit).

⁹ *See* Letter from W. Ray Rutngamlug, Associate General Counsel, Intelsat US LLC, to Ms. Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20090108-00004 (Oct. 6, 2022).

expiration date of the license is January 14, 2023. This expiration date is more than two years before the current projected end of life of Intelsat 11, which is March 15, 2025. To the extent the satellite's projected end of service life is extended in the future, Intelsat will seek an additional license term extension.

II. REQUEST FOR MODIFICATION OF GEOGRAPHIC COVERAGE AREA

Intelsat also seeks to modify the C-band pointing of Intelsat 11 to obtain a new coverage area, which is described in the attached Engineering Statement and depicted in the GXT files attached to Schedule S in order to meet new customer service requirements.¹⁰

III. PUBLIC INTEREST SHOWING

Grant of this modification application serves the public interest. The Intelsat 11 satellite's subsystems and solar panels are functioning normally, and there are no single points of failure that would affect the ability to de-orbit the satellite.¹¹ Additionally, the satellite's telemetry, tracking, and command functions are operating normally, and all of the payload is operational. Extending the license term will allow Intelsat to maximize the use of Intelsat 11, which has more than two years of useful life remaining beyond the current license term. It will also promote the continued efficient use of orbital resources and is consistent with prior decisions by the Commission to extend satellite license terms.¹² Additionally, modifying the C-

¹⁰ Intelsat is also seeking Special Temporary Authority to begin operating over the coverage requested. *See* Intelsat License LLC, Request for Special Temporary Authority, File No. SAT-STA-20221111-00158, Exhibit A (filed Nov. 11, 2022).

¹¹ Extending the license term of Intelsat 11 will not affect the satellite's previously approved post-mission disposal plan. *See* Engineering Statement at 6.

¹² *See, e.g., Application of Intelsat License LLC to Modify Authorization for Intelsat 9*, Stamp Grant, File No. SAT-MOD-20200226-00019 (May 20, 2020) (granting license extension when satellite's expected end of service life was 15 months after the original grant's expiration date).

band coverage as described in the attached Engineering Statement and GXT files will further serve the public interest by enabling Intelsat to meet customer demand over the new coverage area.¹³

IV. **CONCLUSION**

For the reasons set forth above, Intelsat respectfully requests that the Commission grant this license modification.

Respectfully submitted,

Intelsat License LLC

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November 14, 2022

¹³ See Engineering Statement at 1; Intelsat License LLC, Request for Special Temporary Authority, File No. SAT-STA-20221111-00158, Exhibit A (filed Nov. 11, 2022).

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 *2022 Intelsat Order*.

¹ See *Intelsat S.A., as debtor-in-possession (Transferor) and New TopCo S.A. (Transferee)*, Order, IBFS File No. SAT-ASG-20210826-00117, IB Docket No. 21-375, DA-22-162 (rel. Feb. 16, 2022) ("*2022 Intelsat Order*").

Exhibit B

FCC Form 312, Response to Question 40: Officers, Directors, and Ten Percent or Greater Shareholders

Intelsat License LLC is a Delaware limited liability company. The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

José Toscano, Deputy Chairman
Michelle Bryan, General Counsel, Chief
Administrative Officer, and Secretary
Mirjana Hervy, Director, Finance

Board of Managers:

José Toscano
Michelle Bryan

The business address of all Intelsat License LLC officers and members of the Board of Managers is: 7900 Tysons One Place, McLean, Virginia 22102.

Intelsat License LLC is a Delaware limited liability company that is indirectly wholly owned by Intelsat S.A. (formerly named Intelsat Emergence S.A.). Specifically, Intelsat License LLC is wholly owned by Intelsat License Holdings LLC, 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 (Intelsat Genesis GP LLC, a Delaware limited liability company) and two limited partners (Intelsat Genesis Inc., a Delaware corporation, and Intelsat Jackson Holdings S.A., a Luxembourg company). Intelsat Genesis GP LLC is wholly owned by Intelsat Genesis Inc., which is wholly owned by Intelsat Jackson Holdings S.A. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat Connect Finance S.à r.l., 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.à r.l., a Luxembourg company. Intelsat (Luxembourg) S.à r.l. is wholly owned by Intelsat Investments S.à r.l., a Luxembourg company, which in turn is wholly owned by Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat 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.

Pacific Investment Management Company LLC (“PIMCO”), a Delaware limited liability company, serves as the manager or investment advisor for a number of investment funds and other investment vehicles that each hold less than 10% of the voting and non-voting equity interests in Intelsat S.A. However, to the best of Intelsat’s knowledge, as of August 23, 2022, the aggregate total of the voting and non-voting equity interests in Intelsat S.A. held by PIMCO-managed funds and certain parent entities of PIMCO exceeded 10%. Details regarding PIMCO are listed below.

PIMCO

Name: Pacific Investment Management Company LLC
Address: 650 Newport Center Drive, Newport Beach, CA
92660
Citizenship: United States (Delaware)
Indirect Voting Interest: Approximately 32.99%
Indirect Non-Voting Interest: Approximately 32.99%

A complete list of the investment funds and entities collectively controlling a 10% or greater indirect voting and indirect non-voting interest in Intelsat S.A. is set forth in Intelsat's 2022 application for consent to the assignment and transfer of control of authorizations.²

² See Application for Assignment and Transfer of Control of Authorizations held by Intelsat License LLC, as debtor-in-possession, IBFS File No. SAT-ASG-20210826-00117 (filed Aug. 26, 2021).