

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Galaxy 11 (S2253)

File No. SAT-MOD-_____

**APPLICATION OF INTELSAT LICENSE LLC TO MODIFY
AUTHORIZATION FOR GALAXY 11**

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 Galaxy 11 (S2253), a C- and Ku-band satellite operating in inclined orbit at 93.1° W.L.² Specifically, Intelsat seeks to further extend the Galaxy 11 license term, and previously granted waivers, through June 30, 2024,³ and to modify the Ku-band coverage.

¹ 47 C.F.R. § 25.117.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice) (“*Galaxy 11 Authorization*”) (granting Intelsat’s request to extend the Galaxy 11 license term and drift Galaxy 11 to, and operate the satellite in inclined orbit at, 93.1° W.L.). Pursuant to special temporary authority (“STA”), Intelsat is currently operating the satellite’s Ku-band beams (10.95-11.2 GHz and 11.7-12.2 GHz (space-to-Earth); and 13.75-14.5 GHz (Earth-to-space)) over a different coverage area than the permanently licensed coverage in the 10.95-11.2 GHz and 11.7-12.2 GHz (space-to-Earth) and 13.75-14.5 GHz (Earth-to-space) bands. See *Policy Branch Information; Actions Taken*, Report No. SAT-01661, File No. SAT-STA-20220504-00046 (Aug. 26, 2022) (Public Notice); Intelsat License LLC Request for Extension of Special Temporary Authority to Operate Galaxy 11 at 93.1° W.L. with New Beam Coverages, IBFS File No. SAT-STA-20221031-00150, Call Sign S2253 (filed Oct. 31, 2022) (collectively, “*Galaxy 11 STAs*”).

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.”);

In accordance with 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. Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate the Galaxy 11 satellite pursuant to the terms and conditions of its expiring license and existing grant of STA until such time as the Commission makes a determination with respect to this request.⁵ Additionally, Intelsat will operate Galaxy 11 in accordance with the Commission's C-band Order and Footnote NG182 of the U.S. Table of Frequency Allocations.⁶

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat requests the Commission further extend the license term for the Galaxy 11 satellite through June 30, 2024, to accommodate the satellite's remaining service life.⁷

Galaxy 11 is a C- and Ku-band satellite licensed to operate at 93.1° W.L. in the following:

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).

⁴ 47 C.F.R. § 25.117(c).

⁵ 47 C.F.R. § 1.62.

⁶ 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).

⁷ Intelsat's application for further extension is consistent with the Commission's decision in the *2020 Orbital Debris Order* to limit license term extensions to no more than five years in a single modification application to "help ensure reasonable predictions regarding satellite health

Frequencies:	3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space) 10950-11200 MHz (space-to-Earth) 11700-12200 MHz (space-to-Earth) 13750-14500 MHz (Earth-to-space) Telemetry, Tracking, and Command (TT&C”) center frequencies: 14000.5 MHz and 14498.5 MHz (Earth-to-space) 11701 MHz and 11702 MHz (space-to-Earth)
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Based on the license extension granted by the Commission in 2019, the license term for Galaxy 11 will expire on December 31, 2022.⁸ This expiration date is approximately 18 months before the expected end of life of the satellite, which was most recently estimated to be June 2024.⁹ To the extent the satellite’s projected end of life is extended in the future, Intelsat may request an additional extension of the license term.

II. REQUEST FOR MODIFICATION OF GEOGRAPHIC COVERAGE AREAS

Additionally, Intelsat seeks to fully utilize Galaxy 11’s ability to move the adjustable Ku-band reflectors to gain additional geographic coverage flexibility. Currently, pursuant to STA, Intelsat is biasing the reflectors of the Standard Ku-band North America Beam and the Extended Ku-band North America Beam to achieve new Ku-band coverage areas.¹⁰ This coverage area is optimized for the current customer service requirements and the steerability, and resulting flexibility, requested herein will allow Intelsat to expeditiously meet new and evolving customer

while affording operators some flexibility.” *Mitigation of Orbital Debris in the New Space Age*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 4156, ¶ 112 (2020).

⁸ See *Galaxy 11 Authorization*.

⁹ Intelsat foreshadowed that “[t]o 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.” Application of Intelsat License LLC to Modify Authorization for Galaxy 11 (S2253), IBFS File No. SAT-MOD-20181231-00095 at 4 (filed Dec. 31, 2018) (“*2018 Galaxy 11 Modification Application*”).

¹⁰ See *Galaxy 11 STAs*.

requirements. Intelsat describes the Ku-band steerability and coverage in the accompanying Engineering Statement and Schedule S.

III. POST MISSION DISPOSAL

Extending the license term of Galaxy 11 will not affect the satellite's previously approved post-mission deorbit height.¹¹ At the end of the Galaxy 11 mission, Intelsat will dispose of the satellite by moving it to an altitude of at least 175 kilometers above the geostationary arc,¹² and has reserved 6.7 kilograms of fuel for that purpose.¹³ Additional information regarding the orbital debris mitigation plan for Galaxy 11 is provided in the accompanying Engineering Statement.

IV. FURTHER EXTENSION OF PREVIOUSLY APPROVED WAIVERS

To the extent necessary, Intelsat requests that the waivers previously granted for the Galaxy 11 satellite be continued for the reasons previously stated.¹⁴ Specifically, Intelsat seeks an extension of waivers granted for Galaxy 11 of 47 C.F.R. § 2.106, NG52, to use the 10.95-11.2 GHz band to offer domestic services on an unprotected, non-harmful interference basis in

¹¹ See *2018 Galaxy 11 Modification Application*, Engineering Statement at 4-6.

¹² In its Second Report and Order in IB Docket No. 02-54, *Mitigation of Orbital Debris*, the FCC designated satellites launched prior to March 18, 2002, such as the Galaxy 11 satellite, as “grandfathered” satellites not subject to a specific minimum disposal altitude. See *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567, ¶¶ 81-82 (2004).

¹³ The reserved propellant figure is an estimate. This figure is calculated taking into account the expected mass of the satellite at the end of life and the required delta-velocity to achieve the desired orbit. The estimated fuel reserve provided herein is more refined than the previously provided estimates. See, e.g., *2018 Galaxy 11 Modification Application*, Engineering Statement at 5.

¹⁴ See *2018 Galaxy 11 Modification Application* at 5-7.

the United States, and of 47 C.F.R. §§ 25.114(d)(14)(ii) and 25.283(c), which require that spacecraft vent pressurized systems at end of life.¹⁵

V. PUBLIC INTEREST SHOWING

Grant of this modification application would serve the public interest. The Galaxy 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. Additionally, the satellite's TT&C functions are operating normally, and all of the payload is operational. Extending the license term will allow Intelsat to maximize the use of Galaxy 11, which has almost one and a half more years of useful life remaining beyond the current license term. 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.¹⁶ Additionally, updating the Ku-band geographic coverage as sought herein will further serve the public interest by enabling Intelsat to better meet current and future customer requirements.

¹⁵ See *Application of Intelsat License LLC to Modify Authorization for Galaxy 11*, Stamp Grant, IBFS File No. SAT-MOD-20181231-00095, Condition 9 (Apr. 16, 2019).

¹⁶ See, e.g., *Policy Branch Information; Actions Taken*, Report No. SAT-001606, File No. SAT-MOD-20210205-00016 (Jan. 28, 2022) (Public Notice) (granting an extension of the Galaxy 15 license term and previously granted waivers of Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission's rules relating to the spacecraft's end of life processes).

VI. CONCLUSION

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

Respectfully submitted,

Intelsat License LLC

By: /s/ Cynthia J. Grady

Jennifer D. Hindin
Madeleine M. Lottenbach
WILEY REIN LLP
2050 M Street, NW
Washington, DC 20036

W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

December 30, 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).