Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of Intelsat License LLC Application to Modify Authorization for Horizons 2 (S2423)	File No. SAT-MOD-____________

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR HORIZONS 2**

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 Horizons 2 (S2423), a Ku-band satellite operating at 73.8° W.L.[2] Specifically, Intelsat seeks to further extend the Horizons 2 license term, and previously granted waivers, through February 7, 2028.

In accordance with the Commission's rules,[3] this application has been filed electronically as an attachment to FCC Form 312. Intelsat incorporates by reference all required technical

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1 47 C.F.R. § 25.117.

2 *See Policy Branch Information; Actions Taken*, Report No. SAT-01485, File No. SAT-MOD-20200114-00009 (July 31, 2020) (Public Notice) ("*Horizons 2 Authorization*") (granting Intelsat's request to redeploy Horizons 2 to, and operate the satellite at, the 73.8° W.L. orbital location). Pursuant to special temporary authority ("STA"), Intelsat is currently biasing the satellite platform to 0.2° E and 0.4° S, and operating the satellite over the resulting coverage area. *See Policy Branch Information; Actions Taken*, Report No. SAT-01674, File No. SAT-STA-20220922-00125 (Oct. 14, 2022) (Public Notice); Intelsat License LLC Requests for Extension of Special Temporary Authority to Bias the Horizons 2 Satellite, File Nos. SAT-STA-20221108-00153, SAT-STA-20221212-00171, and SAT-STA-20230111-00002, Call Sign S2423 (filed Nov. 8, 2022, Dec. 12, 2022, and Jan. 11, 2023, respectively) (collectively, "*Horizons 2 STAs*").

3 47 C.F.R. § 25.117(c).

information in the Schedule S previously provided to the Commission for operations at 73.8° W.L.[4] Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate the Horizons 2 satellite pursuant to the terms and conditions of its expiring license and current STA authorization until such time as the Commission makes a determination with respect to this request.[5]

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat requests the Commission extend the license term for the Horizons 2 satellite through February 7, 2028, to accommodate the satellite's remaining service life. Horizons 2 is a Ku-band satellite licensed to operate at 73.8° W.L. in the following frequencies:

Frequencies:	11700-12200 MHz (space-to-Earth) 14000-14500 MHz (Earth-to-space) Telemetry, Tracking, and Command (TT&C") center frequencies: 12196.0 MHz and 12198.63 MHz (space-to-Earth) 14000.5 MHz and 14499.5 MHz (Earth-to-Earth)

Horizons 2 was placed into service February 8, 2008,[6] and in accordance with the terms of its FCC authorization, the expiration date of the license is February 7, 2023.[7] This expiration date is more than sixteen months before the satellite's expected end of life, which was most recently estimated to be June 2024, assuming no inclined-orbit operations. Intelsat's planned inclined orbit operation of Horizons 2 will extend the satellite's expected end of service life an additional five years—June 2029. To accommodate the planned inclined-orbit operation of

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[4] *See* 47 C.F.R. § 25.114; *Application of Intelsat License LLC to Modify Authorization for Horizons 2 (S2423)*, File No. SAT-MOD-20111011-00197, Schedule S (filed Jan. 14, 2020).

[5] 47 C.F.R. § 1.62.

[6] *See* Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Mar. 24, 2008) (IBFS File No. SAT-MOD-20070628-00090).

[7] *See Horizons 2 Authorization*.

Horizons 2, and consistent the Commission's recently adopted five-year term limit for license extensions,[8] Intelsat requests the Commission extend the Horizons 2 license term through February 7, 2028. Based on the satellite's current end of life projection, Intelsat expects to request an additional extension of the license term in the future.

II. <u>FURTHER EXTENSION OF PREVIOUSLY APPROVED WAIVERS</u>

To the extent necessary, Intelsat requests that the waivers previously granted for the Horizons 2 satellite be continued for the reasons previously stated.[9] Specifically, Intelsat seeks an extension of waiver of Section 25.283(c), as well as a waiver of the related requirement in Section 25.114(d)(14)(ii), of the Commission's rules requiring that spacecraft vent pressurized systems at end of life.[10]

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[8] The Commission adopted a new subsection (f) to FCC Rule 25.121 in the *2020 Orbital Debris Order* that would limit license term extensions to no more than five years in a single modification application and would require applicants to provide certain additional information regarding satellite health. This new rule contains information collection requirements and thus is not effective until approved by the Office of Management and Budget. *See* Mitigation of Orbital Debris in the New Space Age, 85 Fed. Reg. 52422 (Aug. 25, 2020); *Mitigation of Orbital Debris in the New Space Age*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 4156, ¶ 215 (2020).

[9] *See Application of Intelsat License LLC to Modify Authorization for Horizons 2*, Stamp Grant, File No. SAT-MOD-20110928-00190, Condition 5 (Jan. 31, 2012) ("Intelsat's request for continued waiver of Sections 25.114(d)(3) and 25.283(c) of the Commission's rules, 47 C.F.R. §§ 25.114(d)(3), 25.283(c), is granted for the reasons stated in the original grants of waiver. *See* IBFS File No. SAT-MOD-20070628-00090, as amended by File No. SAT-AMD-20070731-00108"). The Commission revised and renumbered Section 25.114(d)(3) requirements (now Section 25.114(c)(4)(vi)) in its *2013 Satellite Licensing Order*. *See Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Report and Order, 28 FCC Rcd 12403 (2013).

[10] 47 C.F.R. §§ 25.283(c) (requiring that licensees "ensure, unless prevented by technical failures beyond its control, that stored energy sources on board the satellite are discharged, by venting excess propellant, discharging batteries, relieving pressure vessels, or other appropriate measures."), 25.114(d)(14)(ii) (requiring applicants to "address whether stored energy will be removed at the spacecraft's end of life, by depleting residual fuel and leaving all fuel line valves open, venting any pressurized system, leaving all batteries in a permanent discharge state, and

III. PUBLIC INTEREST SHOWING

Grant of this modification application would serve the public interest. Extending the license term will allow Intelsat to maximize the use of Horizons 2, which has more than six years of useful life remaining beyond the current license term, including future inclined-orbit operations. Moreover, extending the license term of the Horizons 2 satellite will not affect the satellite's previously approved post-mission disposal plan.[11] At the end of the Horizons 2 mission, Intelsat will dispose of the satellite by moving it to an altitude of at least 280 kilometers above the geostationary arc, and has reserved 34.9 kilograms of fuel for that purpose.[12] The Horizons 2 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. Thus, 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.[13]

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removing any remaining source of stored energy, or through other equivalent procedures specifically disclosed in the application.").

[11] *See id.*; Application of Intelsat License LLC to Modify Authorization for Horizons 2, File No. SAT-MOD-20200114-00009, Engineering Statement, 6-7 (filed Jan. 14, 2020).

[12] 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.

[13] *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); *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01612, File No. SAT-MOD-20201229-00152 (Feb. 18, 2022) (Public Notice) (granting an extension of the Galaxy 14 license term based on planned inclined-orbit operations).

IV. 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*

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February 1, 2023

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*.

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[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 Luxemburg 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]

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[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).