

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Intelsat 10 (S2382)

File No. SAT-MOD-_____

**APPLICATION OF INTELSAT LICENSE LLC TO
MODIFY AUTHORIZATION FOR INTELSAT 10**

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 Intelsat 10 (S2382), a C- and Ku-band satellite operating in inclined orbit at 177.8° E.L. pursuant to special temporary authority (“STA”).² Specifically, Intelsat seeks to amend its license to operate Intelsat 10 at 177.8° E.L.³ Grant of this modification application

¹ 47 C.F.R. § 25.117.

² See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01701, File No. 20220912-00105 (Feb. 17, 2023) (Public Notice) (“*Intelsat 10 STA*”) (granting Intelsat an additional 180 days of STA to operate Intelsat 10 at the 177.8° E.L. orbital location). Intelsat began operating Intelsat 10 in inclined orbit operations in 2015. See Letter from Cynthia J. Grady, Intelsat, to Ms. Marlene H. Dortch, FCC, File No. SAT-MOD-20130322-00052 (Jul. 8, 2015). Intelsat 10 is licensed to operate at the 47.5° E.L. orbital location. See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01454, File No. SAT-MOD-20191008-00109 (Mar. 20, 2020) (Public Notice) (“*Intelsat 10 Authorization*”) (modifying the C- and Ku-band beam coverage areas at 47.5° E.L.).

³ The Commission’s rules permit extension and modification applications in the 3700-4200 MHz band. 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.”); see also *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, ¶ 152 n. 422 (2020) (“*C-band Order*”) (codifying modified

would serve the public interest by allowing Intelsat to continue providing additional capacity from the nominal 178° E.L. orbital location.

In accordance with the Commission’s rules, this application has been filed electronically as an attachment to FCC Form 312 and Intelsat provides technical information relating to this modification in the accompanying Engineering Statement, Schedule S, and .gxt files.⁴

Additionally, Intelsat will operate Intelsat 10 in accordance with the Commission’s *C-band Order* and footnote NG182 of the U.S. Table of Frequency Allocations.⁵

I. REQUEST TO OPERATE INTELSAT 10 AT 177.8° E.L.

Intelsat herein requests authority to operate Intelsat 10 at 177.8° E.L. in the following frequencies:

Frequencies:	3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space) 11.45-11.7 GHz (space-to-Earth) 12.25-12.75 GHz (space-to-Earth) 14.0-14.5 GHz (Earth-to-space) Telemetry, Tracking, and Command (TT&C”) center frequencies: 11.699 GHz, 12.7475 GHz, 12.7485 GHz, and 12.7495 GHz (space-to-Earth) 14.0005 GHz and 14.4995 GHz (Earth-to-space)
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portions of the International Bureau’s June 21, 2018 freeze to “bar new applications for space station licenses and new petitions for market access concerning space-to-Earth operations” but not “applications for extension, cancellation, replacement, or modification of existing authorizations”).

⁴ 47 C.F.R. §§ 25.117(b), (c), 25.114.

⁵ 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 (filed May 26, 2020).

Intelsat 10 is currently licensed to operate at 47.5° E.L.,⁶ and was redeployed to 177.8° E.L. in early 2021,⁷ where it is currently operating pursuant to STA.⁸

II. EXTENSION OF WAIVERS PREVIOUSLY GRANTED

To the extent necessary and out of an abundance of caution, Intelsat requests that the Commission extend the previously granted waivers of its rules for the reasons set forth in its existing authorization. Specifically, Intelsat requests that the Commission extend waiver of Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission’s rules, which require applicants to demonstrate that spacecraft are able to vent all pressurized systems at end of life.⁹

III. PUBLIC INTEREST SHOWING

Grant of this application would serve the public interest by allowing Intelsat to continue providing additional capacity from the nominal 178° E.L. orbital location.

Further, grant of this application will not result in an increased risk of harmful interference. Intelsat will continue to operate the Intelsat 10 satellite’s communications payload and TT&C frequencies at 177.8° E.L. in conformance with applicable coordination agreements and the FCC’s rules governing operations vis-à-vis adjacent locations.

⁶ See *Intelsat 10 Authorization*.

⁷ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01540, File No. SAT-STA-20210125-00014 (Mar. 26, 2021) (Public Notice).

⁸ See *Intelsat 10 STA*.

⁹ See *Intelsat License LLC, Application to Modify Authorization for Intelsat 10*, Stamp Grant, File No. SAT-MOD-20130322-00052, 2, at Condition 13 (2013) (granting waiver “because Intelsat 10 was launched before Section 25.283(c) became effective and compliance would require direct retrieval of the spacecraft, which is not currently possible”).

IV. REQUEST FOR GRANT WITHOUT MILESTONES OR A BOND

Intelsat 10 is already in-orbit and operating at 177.8° E.L. Therefore, 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.¹⁰

V. CONCLUSION

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

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

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¹⁰ See 47 C.F.R. §§ 25.164(a) and 25.165.

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.¹

¹ 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).