

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization
for Galaxy 35 (S3143)

File No. SAT-MOD- _____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR GALAXY 35**

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 35 (S3143), a C-band satellite operating at 95.05° W.L.² By this modification application, Intelsat seeks to relocate Galaxy 35 by approximately two degrees, from 95.05° W.L. to 93.1° W.L.³ Grant of this application will enable Intelsat to provide improved C-band coverage and capacity from the nominal 93° W.L. orbital location to the same customers Intelsat planned to serve from the nominal 95° W.L. orbital location.

¹ 47 C.F.R. § 25.117.

² See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01686, File Nos. SAT-RPL-20220414-00041, SAT-AMD-20221006-00129 (Dec. 9, 2022) (Public Notice) (“*Galaxy 35 Authorization*”).

³ The Commission’s rules permit 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 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”).

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 in the Schedule S and in narrative form in the attached Engineering Statement.⁵ Additionally, Intelsat will operate Galaxy 35 in accordance with the Commission's C-band Order and Footnote NG182 of the U.S. Table of Frequency Allocations.⁶

I. REQUEST TO RELOCATE GALAXY 35 TO 93.1° W.L.

Intelsat requests license authority to operate the Galaxy 35 satellite at 93.1° W.L. in the following frequencies:

Frequencies:	3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space)
	Telemetry, Tracking, and Command (TT&C") frequencies: ⁷ 3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space)

Galaxy 35 is currently located at 93.1° W.L. pursuant to a grant of Special Temporary Authority ("STA"),⁸ and is authorized by license to operate at the 95.05° W.L. orbital location.⁹

⁴ 47 C.F.R. §§ 25.117(b), (c).

⁵ See 47 C.F.R. § 25.114.

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 Galaxy 35 is equipped with 2 tunable command receivers and 2 tunable telemetry transmitters. The center command frequency on each receiver and transmitter is selectable via ground command in 100 kHz steps within the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) frequency ranges.

⁸ See *Satellite Licensing Division and Satellite Programs and Policy Division Information; Actions Taken*, Report No. SAT-01720, File No. SAT-STA-20230407-00078 (Apr. 28, 2023) (Public Notice).

⁹ See *Galaxy 35 Authorization*.

Galaxy 35 was launched on December 13, 2022. On March 12, 2023, following completion of in-orbit testing at 150.05° W.L., the satellite was placed at 94.85° W.L., which is the location where the satellite it is replacing, Galaxy 3C (S2381), is located pursuant to STA.¹⁰ The 95.05° W.L. location, where Galaxy 3C and the Galaxy 35 replacement satellite are both permanently licensed to operate, is occupied by the Intelsat 30 (S2887) and Intelsat 31 (S2924) satellites. After the completion of in orbit testing, the Galaxy 35 spacecraft was collocated with Galaxy 3C instead of with Intelsat 30 (S2887) and Intelsat 31 (S2924).

Intelsat promptly notified the Space Bureau by phone that Galaxy 35 had been inadvertently positioned at 94.85° W.L.¹¹ and submitted a request for STA on April 13, 2023, to operate the satellite's TT&C frequencies at 94.85° W.L. until Galaxy 35 could be relocated.¹² On April 26, 2023, the FCC granted Intelsat STA to use the TT&C frequencies for the drift to and station-keeping operation of Galaxy 35 at 93.1° W.L.¹³ Galaxy 35 arrived on-station at 93.1° W.L. on May 4, 2023. Further, Intelsat has put procedures in place to avoid a similar event from happening in the future.

¹⁰ See, e.g., *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01708, File No. SAT-STA-20230303-00046 (Mar. 10, 2023) (Public Notice) (granting authority to relocate Galaxy 3C from 95.05° W.L. to 94.85° W.L. in order to facilitate safe operation of multiple satellites at the nominal 95° W.L. orbital location). See also, Intelsat License LLC, Request for Further Extension of Special Temporary Authority, File No. SAT-STA-20230404-00071 (filed Apr. 4, 2023); Intelsat License LLC, Request for Further Extension of Special Temporary Authority, File No. SAT-STA-20230508-00106 (filed May 8, 2023).

¹¹ Intelsat corrected its Notice of Commencement of Operations on May 12, 2023. See Letter from Cynthia J. Grady, Assistant General Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, File No. SAT-RPL-20220414-00041 (filed May 12, 2023).

¹² Intelsat License LLC, Request for Special Temporary Authority for Galaxy 35, File No. SAT-STA-20230413-00087 (filed Apr. 13, 2023).

¹³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01720, File No. SAT-STA-20230407-00078 (Apr. 28, 2023) (Public Notice).

At the 93.1° W.L. location, Galaxy 35 is co-located with Galaxy 11 (S2253).¹⁴ The specific communications frequencies associated with the Galaxy 35 and Galaxy 11 satellites are identified in the chart below.

	Galaxy 35	Galaxy 11
3700-4200 MHz	✓	✓
5925-6425 MHz	✓	✓
10.95-11.2 GHz		✓
11.7-12.2 GHz		✓
13.75-14.5 GHz		✓

II. PUBLIC INTEREST SHOWING

Grant of this modification application to relocate Galaxy 35 is in the public interest because it will allow Intelsat to meet customer demand for improved C-band capacity and coverage from 93.1° W.L. Further, grant of this relocation request will not result in an increased risk of harmful interference. Intelsat will operate Galaxy 35’s communications payload and TT&C frequencies at 93.1° W.L. in conformance with existing coordination agreements and the FCC’s rules governing operations vis-à-vis adjacent locations.

¹⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice) (“*Galaxy 11 Authorization*”).

III. 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

May 17, 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*.

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:

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

Board of Managers:

Aaron Shourie
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 April 7, 2023, 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 32.89%
Indirect Non-Voting Interest: Approximately 32.89%

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).