

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Galaxy 18 (S2733)

File No. SAT-MOD- _____

APPLICATION TO MODIFY AUTHORIZATION FOR GALAXY 18

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 18 (S2733), a C- and Ku-band satellite operating at 123° W.L.² Specifically, this modification application seeks authority to extend the license term of Galaxy 18 through March 31, 2031,³ to align with the satellite’s end of service life.⁴

¹ 47 C.F.R. § 25.117.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00477, File No. SAT-RPL-20070222-00035 (Oct. 26, 2007) (Public Notice) (“Galaxy 18 Authorization”).

³ Intelsat does not seek extension of previously granted waivers of 47 C.F.R. §§ 25.114(d)(3), 25.210(i) (2007), which have since been eliminated.

⁴ 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 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 requirements of the Commission's rules,⁵ this application has been filed electronically as an attachment to FCC Form 312. Intelsat incorporates by reference all required technical information in the Engineering Statement previously provided to the FCC for operation at 123° W.L.⁶ and provides an updated Schedule S. Consistent with Section 1.62 of the Commission's rules, Intelsat will continue to operate the Galaxy 18 satellite pursuant to the terms and conditions of its expiring license until such time as the Commission makes a determination with respect to this request.⁷ Additionally, Intelsat will operate Galaxy 18 in accordance with the Commission's C-band Order and Footnote NG182 of the U.S. Table of Frequency Allocations.⁸

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat seeks to extend the license term for the Galaxy 18 satellite through March 31, 2031, or alternatively, five years from license grant, to accommodate the satellite's remaining service life.⁹ Galaxy 18 is a C- and Ku-band satellite licensed to operate at 123° W.L. in the following frequencies:

⁵ 47 C.F.R. § 25.117(c).

⁶ See *PanAmSat Licensee Corp., Application for Authority to Launch and Operate a Replacement Satellite at 123° W.L.*, File No. SAT-RPL-20070222-00035 (filed Feb. 22, 2007) ("Galaxy 18 Application"). All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. See *Policy Branch Information; Actions Taken*, Report No. SAT-00746, File No. SAT-ASG-20101203-00252 (Dec. 29, 2010) (Public Notice).

⁷ 47 C.F.R. § 1.62.

⁸ 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).

⁹ Intelsat's request in the alternative seeks to align 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 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).

Frequencies:	3700-4200 MHz (space-to-Earth) ¹⁰ 5925-6425 MHz (Earth-to-space) 11700-12200 MHz (space-to-Earth) 14000-14500 MHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) center frequencies: 4197.125 MHz and 4198.875 MHz (space-to-Earth) 5926.5 MHz and 6424.5 MHz (Earth-to-space)
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Galaxy 18 was placed into service on June 3, 2008.¹¹ Pursuant to the conditions of its authorization, the license term for Galaxy 18 will expire on June 2, 2023.¹² This expiration date is almost 8 years before the expected end of life of the satellite, which was most recently estimated to be March 31, 2031. Based on this estimate, Intelsat expects to seek further extension of the license term in the future.

II. POST MISSION DISPOSAL

Extending the license term of Galaxy 18 will not affect the satellite’s previously approved post-mission deorbit height.¹³ At the end of the Galaxy 18 mission, Intelsat will dispose of the satellite by moving it to an altitude of at least 300 kilometers above the

This and other Part 25 rule changes that require review and approval by the Office of Management and Budget under the Paperwork Reduction Act are not yet effective. *See id.*, ¶ 215; *see also Mitigation of Orbital Debris in the New Space Age*, 85 FR 52422 (Aug. 25, 2020) (“The amendments to §§ 25.271 and 25.282 are effective September 24, 2020. The other rule amendments contain information collection requirements that are not effective until approved by the Office of Management and Budget. The Commission will publish a document in the Federal Register announcing the effective date for those amendments.”).

¹⁰ On September 19, 2016, Intelsat, pursuant to Section 25.140(d) of the Commission’s rules, notified the FCC that it had coordinated non-routine transmission levels with respect to the Galaxy 18 satellite at 123° W.L. *See* Letter from Susan H. Crandall, Associate General Counsel, Intelsat Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-RPL-20070222-00035 (Sept. 19, 2016); 47 C.F.R. § 25.140(d).

¹¹ *See* Letter from Susan H. Crandall, Assistant General Counsel, Intelsat Corporation, to Ms. Marlene H. Dortch, Secretary, FCC, File No. SAT-RPL-20070222-00035 (Jul. 1, 2008).

¹² *See Galaxy 18 Authorization*, Condition 7; *see also* 47 C.F.R. § 25.121(a)(1), (d)(1).

¹³ *See Galaxy 18 Application*, Engineering Statement at 22.

geostationary arc. Intelsat has reserved 84.2 kg of fuel for this purpose.¹⁴ Additional information regarding the orbital debris mitigation plan for Galaxy 18 is provided in the Engineering Statement incorporated by reference with this application.

III. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the Galaxy 18 license term serves the public interest. The Galaxy 18 satellite's subsystems and solar panels are functioning normally, and there are no single points of failure that would result in an inability 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 use of Galaxy 18, which has almost 8 years of useful life remaining beyond the expiration date of 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.¹⁵

¹⁴ See *id.* 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.

¹⁵ See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01538, File No. SAT-MOD-20201222-00150 (Mar. 19, 2021) (Public Notice) (extending the Intelsat 5 satellite's license term for an additional five years).

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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May 26, 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).