

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application to Modify Authorization for
Galaxy 14 (S2385)

File No. SAT-MOD- _____

**APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR GALAXY 14**

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 14 (S2385), a C-band satellite operating in inclined orbit at 32.9° E.L.² Specifically, Intelsat seeks to further extend the Galaxy 14 license term, and previously granted waivers,³ through September 30, 2024, 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-01612, File No. SAT-MOD-20201229-00152, SAT-AMD-20210303-00029, and SAT-AMD-20211005-00129 (Feb. 18, 2022) (Public Notice) (“*Galaxy 14 Authorization*”). Intelsat began operating Galaxy 14 in inclined orbit operations in 2021. See Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-MOD-20051206-00261 and SAT-MOD-2020-1229-00152 (Feb. 8, 2021).

³ Intelsat seeks an extension of the previously granted waivers of 47 C.F.R. §§ 25.114(d)(14)(ii) and 25.283(c) regarding the discharge of stored energy sources at the satellite’s end of life. See *Intelsat License LLC, as debtor in possession, Application to Modify Authorization for Galaxy 14*, Stamp Grant, File Nos. SAT-MOD-20201229-00152, SAT-AMD-20210303-00029, and SAT-AMD-20211005-00129, Condition 10 (Feb. 10, 2022) (“*Galaxy 14 Stamp Grant*”).

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

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 the technical information in the Engineering Statement and Schedule S previously provided to the FCC for operation at 32.9° E.L.⁶ Consistent with Section 1.62 of the Commission’s rules, Intelsat will continue to operate the Galaxy 14 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 14 in accordance with the Commission’s C-band Order and Footnote NG182 of the U.S. Table of Frequency Allocations.⁸

I. REQUEST FOR FURTHER EXTENSION OF LICENSE TERM

Intelsat seeks to further extend the license term for the Galaxy 14 satellite through September 30, 2024. Galaxy 14 is a C-band satellite licensed to operate at 32.9° E.L. in the following frequencies:

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”).

⁵ 47 C.F.R. § 25.117(c).

⁶ *See Intelsat License LLC, as debtor in possession, Application to Modify Authorization for Galaxy 14*, File No. SAT-MOD-20201229-00152 (filed Dec. 29, 2020) (“MOD Application”); *Intelsat License LLC, as debtor in possession, Amendment to Application to Modify Authorization for Galaxy 14*, File No. SAT-AMD-20210303-00029 (filed Mar. 3, 2021) (“First Amendment”); *Intelsat License LLC, as debtor in possession, Further Amendment to Application to Modify Authorization for Galaxy 14*, File No. SAT-AMD-20211005-00129 (filed Oct. 5, 2021) (“Second Amendment” and, together with the MOD Application and First Amendment, the “*Galaxy 14 Application*”).

⁷ 47 C.F.R. § 1.62.

⁸ *C-band Order*; 47 C.F.R. § 2.106 n. NG182.

Frequencies:	3700-4200 MHz (space-to-Earth) 5925-6425 MHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) center frequencies: 4198.0 MHz and 4199.875 MHz (space-to-Earth) 6420.5 MHz (Earth-to-space)
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Galaxy 14 commenced service on January 3, 2006,⁹ and began inclined orbit operations in February 2021.¹⁰ Pursuant to the conditions of its current authorization, the license term for Galaxy 14 will expire on February 29, 2024.¹¹ This expiration date is seven months before the expected end of life of the satellite, which was most recently estimated to be September 30, 2024. 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. FURTHER EXTENSION OF PREVIOUSLY APPROVED WAIVERS

To the extent necessary, 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 previously granted waivers of Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission’s rules,¹² which require an applicant to demonstrate that all stored energy will

⁹ See Letter from Joseph A. Godles, Counsel for PanAmSat Licensee Corp., Goldberg, Godles, Wiener & Wright, to Magalie R. Salas, Secretary, FCC, File No. SAT-MOD-20051206-00261 (Jan. 30, 2006).

¹⁰ See Letter from Cynthia J. Grady, Regulatory Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-MOD-20051206-00261 and SAT-MOD-2020-1229-00152 (Feb. 8, 2021).

¹¹ See *Galaxy 14 Stamp Grant* at Condition 14.

¹² 47 C.F.R. §§ 25.114(d)(14)(ii) and 25.283(c).

be vented at the spacecraft's end of life, be continued for the reasons set forth in the existing authorization.¹³

III. POST MISSION DISPOSAL

Extending the license term of Galaxy 14 will not affect the satellite's previously approved post-mission deorbit height.¹⁴ At the end of the mission, Intelsat will dispose of the spacecraft by moving it to an altitude of at least 270.1 kilometers above the geostationary arc and has reserved 31.06 kilograms of bi-propellant for that purpose. Additionally, the satellite's subsystems and solar panels are functioning normally, and there are no single points of failure on Galaxy 14 that would result in an inability to de-orbit the satellite.

IV. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that its license to operate Galaxy 14 at 32.9° E.L. in the 3700-4200 MHz and 5925-6425 MHz bands will be conditioned as follows:

- Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the ITSO that was approved by the ITSO Twenty-Fifth Assembly of Parties, as amended.
- No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-Fifth Assembly of Parties, as amended.¹⁵

¹³ See *Application of Intelsat License LLC, as debtor in possession, to Modify Authorization for Galaxy 14*, IBFS File No. SAT-MOD-20201229-00152, Stamp Grant at Condition 10 (Feb. 10, 2022). See also *Intelsat License LLC, as debtor in possession, Amendment to Application to Modify Authorization for Galaxy*, File No. SAT-AMD-20210303-00029, Legal Narrative at 4-6 (filed Mar. 3, 2021).

¹⁴ See First Amendment, Engineering Statement at 5.

¹⁵ See *Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended*, Order of Modification, 23 FCC Rcd 2764, ¶¶ 11-13 (2008).

V. PUBLIC INTEREST SHOWING

Grant of this modification application to further extend the Galaxy 14 license term is in the public interest because it will allow Intelsat to maximize the use of Galaxy 14, which has approximately seven additional months of useful life remaining beyond the current license term's expiration date. 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

VI. CONCLUSION

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

Respectfully submitted,

Intelsat License LLC

By: /s/ Cynthia J. Grady

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February 27, 2024

¹⁶ See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01606, File No. SAT-MOD-20210205-00016 (Jan. 28, 2022) (Public Notice) (extending the Galaxy 15 satellite's license term and previously-granted rule waivers).

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 (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 October 13, 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).