Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of Intelsat License LLC Application to Modify Authorization for Galaxy 16 (S2687)	File No. SAT-MOD-____________

APPLICATION OF INTELSAT LICENSE LLC
TO MODIFY AUTHORIZATION FOR GALAZY 16

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 16 (Call Sign S2687), a C-band and Ku-band satellite operating at 99.0° W.L.[2] Specifically, Intelsat seeks to further extend the license term of the Galaxy 16 satellite through August 14, 2031.[3] Additionally, Intelsat seeks waiver of the analysis requirement in 47 C.F.R. § 25.114(d)(14)(ii).

In accordance with the Commission's rules,[4] this application has been filed electronically as an attachment to FCC Form 312. Intelsat incorporates by reference the information previously provided regarding the operations of Galaxy 16. Consistent with Section 1.62 of

[1] 47 C.F.R. § 25.117.

[2] *See Application of Intelsat LLC to Modify Authorization for Galaxy 16*, ICFS file no. SAT-MOD-20210721-00091 (granted Feb. 9, 2022) ("Galaxy 16 Grant"). To the extent necessary, Intelsat requests, to the extent necessary, that waivers previously granted for Galaxy 16 continue to apply during the license extension.

[3] See 47 C.F.R. § 25.121(f)(1)

[4] 47 C.F.R. § 25.117(c).

[5] *See* Galaxy 16 Grant.

the Commission's rules,[6] Intelsat will continue to operate the Galaxy 16 satellite pursuant to the terms and conditions of its expiring license until the Commission acts on this request.

I. REQUEST FOR EXTENSION OF LICENSE TERM

Intelsat requests the Commission further extend the license term for the Galaxy 16 satellite through August 14, 2031. Pursuant to the conditions of its current authorization, the license term for Galaxy 16 will expire on August 14, 2026.[7]

II. POST-MISSION DISPOSAL PLAN

Extending the license term of Galaxy 16 will not affect the satellite's post-mission disposal plan. At the end of the Galaxy 16 mission, Intelsat intends to dispose of the satellite by moving it to an altitude of 296 kilometers (perigee) above the geostationary arc. For that purpose, Intelsat has reserved 9.7 kilograms of propellant. In calculating the disposal orbit, Intelsat used simplifying assumptions as permitted under the Commission's *Orbital Debris Report and Order*.[9] The effective area to mass ratio (Cr*A/M) of the Galaxy 16 spacecraft is 0.061 m2/kg, resulting in a minimum perigee disposal altitude under the Inter-Agency Space Debris Coordination Committee formula of 296 kilometers

[6] 47 C.F.R. § 1.62.

[7] *See* Galaxy 16 Grant.

[8] Intelsat is seeking authority through August 2031 to accommodate deorbit maneuvers.

[9] *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

above the geostationary arc. Accordingly, the Galaxy 16 planned disposal orbit complies with the FCC's rules.

III. WAIVER REQUEST

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."[10] Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.[11] In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."[12] Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In addition to extension of previously granted waivers, Intelsat requests waiver of Section 25.114(d)(14)(ii) of the Commission's rules, which requires a statement indicating whether the space station operator has assessed and limited the probability that the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal.[13] It also requires the statement to include whether this probability for an individual space station is 0.01 (1 in 100) or less, as calculated using the National Aeronautics and Space Administration's ("NASA") Debris Assessment Software ("DAS") or a higher fidelity assessment tool.[14]

Good cause exists here to waive the orbital debris statement requirements in Section

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[10] 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

[11] *N.E. Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

[12] *WAIT Radio*, 418 F.2d at 1159.

[13] *Id.*; 47 C.F.R. § 25.114(d)(14)(ii).

[14] 47 C.F.R. § 25.114(d)(14)(ii).

25.114(d)(14)(ii). Galaxy 16 was launched on June 17, 2006, and was procured, designed, and manufactured in the years prior. Intelsat does not have the information needed to use NASA's DAS or other higher fidelity assessment tool to determine the exact probability of whether "the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal," including if the probability is 0.01 or less.[15] Intelsat has requested the information needed to use NASA's DAS and will supplement its application if the information becomes available.

Waiver is appropriate in this case to avoid undue hardship. Even if Intelsat had the information necessary to complete a DAS analysis, the satellite has been on orbit for more than 20 years and cannot be retrieved and modified. As such, there is no way to further limit this risk in the event that a DAS analysis would result in an outcome probability above 0.01, and waiving Section 25.114(d)(14)(ii) will not affect the satellite's risk of becoming a source of debris. Grant of waiver will also not impact the satellite's previously approved orbital debris plans.

The Commission has granted similar waivers in the past for satellites that are on orbit and cannot be modified. For example, the Commission has regularly waived the Section 25.114(d)(14)(iii) requirement[16] that applicants address whether stored energy will be removed at the spacecraft's end of life and the accompanying Section 25.283(c) fuel venting requirement in cases where "compliance . . . is not achievable except through direct retrieval of the spacecraft," as the rule was promulgated after the satellite's launch.[17] Waiver of the analysis

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[15] *Id.*

[16] When the 2020 orbital debris rules came into effect, these requirements were renumbered; the requirement appears as Section 25.114(d)(14)(ii) in the grants issued prior to August 2024. *See Space Innovation; Mitigation of Orbital Debris in the New Space Age*, 89 Fed. Reg. 65217 (Aug. 9, 2024).

[17] *Application of Intelsat License LLC to Modify Authorization for Galaxy 11 (S2253)*, Public Notice Report No. SAT-01861, ICFS File Nos. SAT-MOD-20221230-00182, SAT-AMD-

and risk limitation required under Section 25.114(d)(14)(ii) here, which was promulgated after the satellite's launch, would serve the same purpose.

IV. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS

Intelsat understands and accepts that authorization to continue operating Galaxy 16 at 99.0° W.L. will be conditioned as follows:

- Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization ("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.[18]

V. PUBLIC INTEREST SHOWING

Grant of this modification application to extend the license term would serve the public interest by enabling customers to receive service from Galaxy 16 at the 99° W.L. orbital location beyond the current license term's expiration date. The Galaxy 16 satellite's subsystems and solar panels are functioning normally, and there are no single points of failure on Galaxy 16 that would result in an inability to de-orbit the satellite. Additionally, the satellite's TT&C functions are operating normally and most of the payload is operational. Extending the license term will promote the continued efficient use of orbital resources and is

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20240629-00146, Stamp Grant at ¶ 8 (granted Oct. 3, 2024). *See also Application of Intelsat License LLC, as debtor-in-possession, to Modify Authorization for Galaxy 15 (S2387)*, ICFS File No. SAT-MOD-20210205-00016, Stamp Grant at ¶ 7 (granted Jan. 26, 2022); *Application of Intelsat License LLC to Modify Authorization for Intelsat 1R (S2368)*, ICFS File No. SAT-MOD-20240328-00067, Stamp Grant at ¶ 6 (granted May 7, 2024).

[18] *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).

consistent with prior decisions by the Commission to extend satellite license terms.[19] Further, extension of the satellite's license term is necessary to ensure that Intelsat may continue to provide service to customers until the expected end of Galaxy 16's service life.

VI. CONCLUSION

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

Respectfully submitted,

Intelsat License LLC

By: */s/ Hilary Rosenthal*
Hilary Rosenthal
Legal Counsel SES
Americom

on behalf of Intelsat License LLC

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August 13, 2026

[19] *See, e.g., Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01199, DA 16-1251, File Nos. SAT-MOD-20160805-00079, SAT-MOD-20160816-00084, and SAT-MOD-20160906-00088 (Nov. 4, 2016) (extending license terms of the Intelsat 904, Intelsat 902, and Intelsat 901 satellites, respectively).

Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

Intelsat License LLC ("Intelsat") is a Delaware limited liability companies that is indirectly wholly owned by SES S.A. The Commission most recently approved foreign ownership in Intelsat License LLC ("Intelsat") in the *SES-Intelsat Order*, wherein the Space Bureau authorized the transfer of control of Intelsat.[1] There have been no material changes to Intelsat's ownership since the *SES-Intelsat Order*.

[1] *See Intelsat S.A. (Transferor) and SES S.A. (Transferee)*, Memorandum Order and Opinion, SB Docket No. 24-267, DA-25-614, ICFS File Nos. SAT-T/C-20240530-00116, SAT-T/C-20240530-00117, SAT-MPL20240809-00176, SAT-MPL-2024080900177, SAT-MPL-20240809-00179, SEST/C-20240530-01222, SES-T/C-2024060301221 (rel. Jul. 11, 2025) ("*SES-Intelsat Order*").

LIST OF STOCKHOLDERS, OFFICERS AND DIRECTORS
(Response to Item 39)

Ownership Information

The applicant, Intelsat License LLC ("Intelsat License"), a Delaware limited liability company, is an indirect wholly-owned subsidiary of SES S.A. ("SES"), a Luxembourg company.

Specifically, Intelsat License LLC is wholly owned by Intelsat License Holdings LLC, also 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 and two limited partners – Intelsat Genesis GP LLC, Intelsat Genesis Inc., and Intelsat Jackson Holdings S.à r.l., respectively. Intelsat Genesis GP LLC is a Delaware limited liability company, which is wholly owned by Intelsat Genesis Inc., a Delaware corporation. Intelsat Genesis Inc. is a wholly owned subsidiary of Intelsat Jackson Holdings S.à r.l., a Luxembourg company. Intelsat Jackson Holdings S.a r.l. is wholly owned Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat Holdings S.à r.l. is wholly owned by SES S.A., a Luxembourg company. Each of these entities may be contacted at the following address: Château de Betzdorf, L-6815 Betzdorf, Grand Duchy of Luxembourg.

Through its subsidiaries and affiliates, SES engages in the provision of satellite services in North and South America, Europe, Africa and Asia. The individual legal entities that are direct and indirect subsidiaries of SES remain distinct.

The offices of SES and all Luxembourg companies listed above is Château de Betzdorf, Betzdorf L-6815, Luxembourg. The offices of Intelsat License and all U.S. entities listed above is 7900 Tysons One Place, McLean VA 22102.

The names, addresses, and citizenship of stockholders owning of record and/or voting 10 percent or more of SES shares, to the best of SES Americom's knowledge, are indicated below. For purposes of this form, unless otherwise indicated, shareholder percentages are calculated using information available to SES as of June 30, 2026.

1. The **Etat du Grand Duché de Luxembourg** (the "State of Luxembourg") and the **Banque et Caisse d'Epargne de l'Etat** ("BCEE") and **Société Nationale de Crédit et d'Investissement** ("SNCI") – each of which is a financial institution 100% owned by the State of Luxembourg – hold Class B shares of SES. Each of the Class B shareholders holds the following economic interest and voting interest percentages, respectively: BCEE holds 5.44% and 10.879%; SNCI holds 5.44% and 10.877%, and the State of Luxembourg holds 5.79% and 11.577%. In addition, SES understands that the State of Luxembourg, BCEE, and SNCI hold a limited number of publicly traded Fiduciary Deposit Receipts ("FDRs"). Based on publicly available information available to SES as of March 31, 2026, the State of Luxembourg, BCEE, and SNCI held FDRs representing an ownership interest of 1.17%, 0.91%, and 1.36%, respectively. The FDR holdings of these entities may have changed and may change at any time, as they are entitled to buy and sell FDRs without notice to SES. The principal business of both BCEE and SNCI is financial services.

The address for the State of Luxembourg is Ministry of State, Department of Media, Connectivity, and Digital Policy, 5, rue Plaetis, L-2338 Luxembourg.

The addresses of BCEE and SNCI are as follows:

Banque et Caisse d'Epargne de
l'Etat 1, place de Metz
L-1930 Luxembourg

Société Nationale de Crédit et
d'Investissement 7, rue du Saint-Esprit
L-1475 Luxembourg

2. **Atlas Infrastructure Partners (UK) Ltd** ("Atlas") holds an 11.95% economic interest and a 9.56% voting interest. Atlas, a U.K. company, is an investment fund and has the below address:

Atlas Infrastructure Partners (UK) Ltd
3rd Floor, 25 Watling St.,
London EC4M 9BR, United Kingdom

3. **The Lazard Entities: Lazard Asset Management, LLC** ("LAM LLC"), a U.S. investment advisor and hedge fund and **Lazard Asset Management Pacific Company**, an Australian investment advisor and wholly owned subsidiary of LAM LLC combined hold a 12.06% economic interest and a 9.65% voting interest in SES.

The addresses of the Lazard Entities are as follows:

Lazard Asset Management, LLC
30 Rockefeller Plaza
New York, NY 10112

Lazard Asset Management Pacific Company
Level 12 Gateway
1 Macquarie Place
Sydney, NSW, 2000

Directors and Officers

The Board of Managers of Intelsat License are:

Aaron Shourie
Nancy Eskenazi

The officers of Intelsat License are:

Aaron Shourie, Chairman
Nancy Eskenazi, Deputy Chairman
Diane Watkinson, VP, Tax
Stephanie Finn, Secretary
Mirjana Hervy, Director, Finance

The address of all officers is 7900 Tysons One Place, McLean VA 22102. All officers are U.S. citizens, except for Ms. Hervy who is a French citizen.