

February 21, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ABS Global Ltd., Petition for Declaratory Ruling Granting Access to the U.S. Market for ABS-3A (Call Sign S2987), File No. SAT-PDR-20161130-00124

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) submits this letter in regard to the above-referenced Petition for Declaratory Ruling of ABS Global Ltd. (“ABS”) seeking U.S. market access for ABS-3A, a Ku- and C-band satellite operating at 3.0° W.L.¹

Intelsat does not oppose the Federal Communications Commission (“FCC” or “Commission”) adding ABS-3A to the U.S. Permitted Space Station List. Intelsat notes, however, that Intelsat and ABS have previously entered into a coordination agreement that covers the proposed operations of the ABS-3A satellite. Accordingly, Intelsat requests that the FCC include in any grant of U.S. market access the following customary condition requiring ABS to comply with all existing and future coordination agreements with respect to its operation of the ABS-3A satellite:

Communications between U.S. licensed earth stations and the ABS-3A space station must be in compliance with all existing and future space station coordination agreements reached between the Russian Federation and other Administrations regarding the nominal 3.0° W.L. location.

Imposing this condition would be consistent with the Commission’s past practices relating to grants of market access petitions.²

¹ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01211, File No. SAT-PDR-20161130-00124 (Jan. 27, 2017) (Public Notice).

² See, e.g., Petition of SES Satellites (Gibraltar) Limited to Add SES-11 to the Permitted Space Station List for C-band Operations at 104.95° W.L., File No. SAT-PPL-2016-0512-00048, Condition #3 (stamp grant Dec. 7, 2016) (“SES Americom must operate SES-11 at the 104.95° W.L. orbital location in compliance with all existing or future coordination agreements for this location.”); Petition of Telesat International Limited for Declaratory Ruling to Add Telstar 19 VANTAGE, a Ku-band and Ka-band Satellite, to the Permitted Space Station List, File No. SAT-PPL-20160225-00020, Condition #2 (stamp grant Aug. 31, 2016) (“Communications between U.S. licensed earth stations and the Telstar 19V space station must be in compliance with all existing and future space station coordination agreements reached between Brazil, the United Kingdom, and other Administrations.”); Petition of Empresa Argentina de Soluciones Satelitales S.A. for Declaratory Ruling to Add ARSAT-2 to the

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Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

CERTIFICATE OF SERVICE

I, Derrick Johnson, hereby certify that on this 21st day of February, 2017, I caused a true and correct copy of the foregoing to be served by first-class mail, postage prepaid, on:

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