



June 13, 2018

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**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Supplemental Letter of Intelsat License LLC

Petition for Declaratory Ruling for EUTELSAT 133WA to Access the U.S. Market and to be Added to the Permitted Space Station List at the Nominal 133° W.L. Orbital Location, File No. SAT-PPL-20180302-00018

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”), by its undersigned counsel, respectfully submits this supplemental letter<sup>1</sup> regarding Eutelsat S.A.’s (“Eutelsat”) request for EUTELSAT 33C (Call Sign S3031, since renamed and referred to herein as “EUTELSAT 133WA”) to access the U.S. market and to be added to the Permitted Space Station List at the nominal 133° W.L. orbital location (the “Petition”).<sup>2</sup>

Intelsat files this supplemental letter to update the Commission that Intelsat no longer opposes Eutelsat’s operation of EUTELSAT 133WA at the nominal 133° W.L. orbital location on an interim basis *provided* that any Commission grant is conditioned on Eutelsat ceasing U.S. operations prior to the arrival of Galaxy 15R at the 133° W.L. orbital location. The FCC recently granted Intelsat’s application to launch and operate a C-band replacement satellite with new Ku- and Ka-band frequencies, to be known as Galaxy 15R, at the 133° W.L. orbital location.<sup>3</sup> Eutelsat has indicated its willingness to have the Commission impose such a condition on EUTELSAT 133WA operations in view of the Galaxy 15R

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<sup>1</sup> Effective June 8, 2018, the FCC designated this application permit but disclose for purposes of the FCC’s *ex parte* rules effective June 8, 2018. See Public Notice, Satellite Policy Branch Actions Taken, DA No. 18-598, Report No. SAT-01322 (June 8, 2018).

<sup>2</sup> Eutelsat S.A., Petition for Declaratory Ruling for EUTELSAT 133WA to Access the U.S. Market and to be Added to the Permitted Space Station List at the Nominal 133° W.L. Orbital Location, Call Sign S3031, File No. SAT-PPL-20180302-00018 (filed Mar. 2, 2018).

<sup>3</sup> Intelsat License LLC, File Nos. SAT-LOA-20170524-00078 and SAT-AMD-20170613-00086, Call Sign S3029 (grant stamp May 10, 2018).



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authorization.<sup>4</sup> Imposing this condition will address the concerns previously raised in Intelsat's Petition to Deny<sup>5</sup> and Reply.<sup>6</sup>

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

*/s/ Jennifer D. Hindin*

Jennifer D. Hindin

*Counsel for Intelsat License LLC*

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<sup>4</sup> Opposition and Response of Eutelsat S.A., File No. SAT-PPL-20180302-00018, at 2 and 5 (filed May 17, 2018) (noting the Commission should grant the request "with appropriate conditions that reflect the interim nature of Eutelsat's proposed operations" and that Eutelsat "expressly commits to terminate the EUTELSAT 133 WA mission at 133° W.L. on or before the commencement of Galaxy 15R's operations".)

<sup>5</sup> Petition to Deny of Intelsat License LLC, File No. SAT-PPL-20180302-00018 (filed May 7, 2018) ("Petition to Deny").

<sup>6</sup> Reply of Intelsat License LLC, File No. SAT-PPL-20180302-00018 (filed June 4, 2018) ("Reply").