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March 31, 2017

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

Re: Intelsat License LLC Notifications of Non-Routine Transmission Levels
Galaxy 16, Call Sign S2687, File No. SAT-RPL-20051118-00233; and
Galaxy 28, Call sign S2160, File No. SAT-MOD-20050422-00089

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") hereby responds to the objection filed by SES Americom, Inc. ("SES") regarding Intelsat's previously filed notifications of non-routine transmission levels for the above referenced satellites.[1]

SES first takes issue with Intelsat's notification of a Ku-band uplink power density level for Galaxy 16 at 99° W.L. of -47 dBW/Hz, stating that while Intelsat and SES "have discussed a draft coordination agreement that would permit this level for Galaxy 16," the agreement has not yet been signed.[2] SES is correct about the status of the SES/Intelsat coordination agreement. However, Intelsat filed the -47 dBW/Hz level in anticipation of the SES/Intelsat coordination agreement being signed so as to avoid having to revise the notification. The actual level previously coordinated by Intelsat with a third party is -46 dBW/Hz. Intelsat herewith attaches a revised notification with the currently applicable higher power level.

SES next asserts that "Intelsat notified a C-band uplink power density level for Galaxy 28 at 89° W.L. of -32 dBW/Hz."[3] Actually, Intelsat notified a C-band **downlink e.i.r.p.** density level of -32 dBW/Hz for that satellite. SES goes on to claim that the -32 dBW/Hz value "exceeds the level specified in the applicable SES-Intelsat coordination agreement by 1 dBW/Hz."[4] That coordination agreement, however, has not yet been signed. The -32 dBW/Hz level reflected in the filed Intelsat notification is accurate because it reflects a level Intelsat coordinated with a third party. Once the SES/Intelsat coordination agreement is signed, Intelsat will revise the notification to reflect any more restrictive level agreed to.

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[1] Letter from Karis A. Hastings, Counsel for SES Americom, Inc., to Ms. Marlene H. Dortch, FCC, File Nos. SAT-RPL-20051118-00233 and SAT-MOD-20050422-00089 (filed Mar. 22, 2017).

[2] *Id.* at 2.

[3] *Id.*

[4] *Id.* at 2-3.

Finally, SES suggests that the Commission "issue a public notice to clarify the terms of Section 25.140(d) and provide uniform guidance to operators."[5] Intelsat does not believe such clarification is necessary. To the extent that operators are expected to file the most restrictive coordinated level in excess of the two-degree levels, there does not appear to be any disagreement.

Respectfully submitted,

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

Attachment

cc: Jose Albuquerque, FCC
Stephen Duall, FCC
Kathyrn Medley, FCC
Karis Hastings, Counsel for SES

[5] *Id.* at 3.

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March 31, 2017

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

Re: Revised Notification of Non-routine Transmission Levels
Galaxy 16, Call Sign S2687, File No. SAT-RPL-20051118-00233

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), pursuant to Section 25.140(d) of the rules of the Federal Communications Commission ("Commission"), 47 C.F.R. § 25.140(d), hereby updates its notification to the Commission of the following coordinated non-routine transmission levels with respect to the above-referenced satellite located at 99° W.L.

Frequency Band	Downlink EIRP Density Level	Uplink Power Density Level	Beam(s)
3.7 – 4.2 GHz	-32 dBW/Hz	-	CHDN, CVDN
14.0 – 14.5 GHz	-	-46 dBW/Hz	KHUP, KVUP

Intelsat understands that per the Commission's rules, it is not obligated to coordinate the above levels with U.S. license applicants and petitioners for U.S. market access that file applications/market access requests after the date of this letter.

Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel
Intelsat Corporation