

**Use of Non-U.S. Licensed Satellites**

Intelsat License LLC ("Intelsat") seeks to communicate with any satellite on the Commission's Permitted Space Station List pursuant to Section 25.227(a)(12) of the Commission's rules, 47 C.F.R. § 25.227(a)(12), including those that are non-U.S. licensed.

Section 25.227(a)(12) permits an ESAA system that complies with the off-axis EIRP spectral density ("ESD") limits in Section 25.227(a)(1)(i) to request Permitted List authority. Permitted List authority is appropriate here because Intelsat will operate its ESAA terminals at all times within the relevant off-axis ESD limits in the plane tangent to the GSO arc (i.e., consistent with two-degree spacing levels). Although the ESAA terminals fully comply with the off-axis ESD masks for GSO operations in Sections 25.227(a)(i)(A) and 25.227(a)(i)(C), out of an abundance of caution, in this Application, Intelsat is requesting a waiver of Section 25.227(a)(i)(B) with respect to the TECOM terminal because it exceeds the ESD mask in the plane perpendicular to the GSO arc. While Intelsat is seeking authority for the TECOM terminal under Section 25.227(a)(2), it seeks this waiver to the extent necessary to permit TECOM terminal operations with Permitted List satellites.