



2550 M Street, NW
Suite 343
Washington, D.C. 20037

Richard R. Cameron
T +1 202 230 4962
rcameron@lmiadvisors.com

August 1, 2017

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

**Re: Intelsat License LLC, Submission pursuant to 47 C.F.R. § 1.65,
IBFS File No. SES-LIC-20170626-00682, Call Sign E170121**

Dear Ms. Dortch:

Following consultation with Commission staff, Intelsat License, LLC (“Intelsat”), hereby clarifies information included in the above-referenced application (the “Application”), filed June 26, 2017, for blanket authorization of certain earth station aboard aircraft (“ESAA”) terminals.

In the Application, consistent with potential application of the U.S. Table of Allocations to U.S.-licensed ESAA terminals regardless of location, Intelsat requested a waiver of Sections 2.106 and 25.227(a) of the Commission’s rules, 47 C.F.R. §§ 2.106 and 25.227(a), to operate these ESAA terminals in the 12.2-12.75 GHz downlink band while on U.S. aircraft located outside of the United States.¹ The waiver would apply only to ESAA operations outside the United States, primarily in Region 1 and Region 3, where usage of this band differs from that within the United States.² However, Table 1 in the Application may inadvertently suggest that Intelsat proposed to use the band within U.S. territory.³

Intelsat requested this waiver out of an abundance of caution, to ensure the greatest degree of compliance in its worldwide operations. Intelsat understands, however, that current Commission practice is to address this issue not through waiver but through license conditions permitting use of the 12.2-12.75 GHz band (outside of the United States only) on a non-conforming, non-interference basis.

¹ See Application of Intelsat License LLC for a Ku-band Earth Stations Aboard Aircraft (“ESAA”) Blanket License, Narrative at 16 (Section II.A.).

² See, *id.*, at 17, n. 28 (“The 12.5-12.75 GHz band is allocated for FSS downlinks in Region 1 and the 12.2-12.75 GHz band is allocated for FSS downlinks in Region 3 . . . Intelsat seeks to use these bands on an unprotected, non-harmful interference basis because ESAA receive operations onboard aircraft in flight have been considered non-conforming MSS operations” in those regions.).

³ See, *id.*, at 11 (compare IS-18 entry with IS-19 entry).

Therefore, in light of the Commission's current practice, Intelsat hereby withdraws the request for waiver to access the 12.2-12.75 GHz band contained in the Application, and requests that the Commission process its request to access the band in accordance with its current approach of granting authority to operate the ESAA terminals in the 12.2-12.75 GHz band outside the United States on a non-conforming, non-interference basis.

Should you have any questions on this matter, please do not hesitate to contact me at (202) 230-4962, or by email at rcameron@lmiadvisors.com.

Very truly yours,

Richard R. Cameron

cc: Paul Blais
Cindy Spiers