



July 1, 2021

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: GEE Licensing Holdings LLC
Application for Modification of License; Call Sign E080100
File Nos. SES-MFS-20210127-00153 and SES-AMD-20210520-00826

Dear Ms. Dortch,

Intelsat License LLC, as debtor-in-possession ("Intelsat"), herein encourages the Federal Communications Commission ("Commission") to grant of the above-referenced GEE Licensing Holdings LLC ("GEE") license modification application, as amended (the "Application"). In its Application GEE seeks, among other requests, authority to add Hispasat 143-W¹ (S3058) as a point of communication in the 12.2-12.75 GHz frequency band (space-to-Earth). Grant of the Application and the associated waiver requests would facilitate the efficient use of the 12.2-12.75 GHz band without causing harmful interference to terrestrial Fixed stations or Broadcast Satellite Service ("BSS") and, as such, should be permitted on an unprotected, non-interference basis.

Intelsat holds a market access authorization for Hispasat 143-W, a Spanish-licensed, Ku-band satellite, currently operating at the 143° W.L. orbital location. Intelsat's U.S. market access grant includes a waiver of the U.S. Table of Allocations to provide fixed satellite service ("FSS") in the 12.2-12.75 GHz frequency band in Region 2 on an unprotected, non-interference basis in the United States and its territories.² GEE similarly requests to operate its E080100 earth station on an unprotected, non-interference basis in order to communicate with Hispasat 143-W.

Permitting GEE to receive FSS transmissions in the 12.2-12.75 GHz band from Hispasat 143-W will facilitate the public interest by furthering the efficient use of these bands without causing harmful interference to terrestrial FS stations or BSS operations because the earth station will not be transmitting in this band. Additionally, as with Hispasat 143-W, the FSS operations sought by GEE in the 12.2-12.75 GHz band are consistent with International Telecommunication Union Radio Regulation No. 5.492.

¹ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01471, File No. SAT-MPL-20200526-00052 (June 5, 2020) (Public Notice).

² See *Intelsat License LLC Petition for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List*, Stamp Grant, File No. SAT-MPL-20200526-00052, Condition 7 (granted April 29, 2020).

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For the above reasons, Intelsat supports the Commission to grant of GEE's Application.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Karl Kensinger
Kerry Murray

CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of July 2021, a copy of the foregoing ex parte was served via email upon:

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