



Federal Communications Commission
Washington, D.C. 20554

July 9, 2013

DA 13-1537

Ms. Susan H. Crandall
Intelsat License LLC
3400 International Drive, N.W.
Washington, DC 20008-3006

Call Sign: KA264
File No.: SES-MOD-20130117-00057

Dear Ms. Crandall:

On January 17, 2013, Intelsat License LLC, (Intelsat) filed the above-captioned application to (1) to relocate its fixed earth station from Clarksburg, MD, to Hagerstown, MD, and (2) to add new emission designators and related service and (3) remove certain previously licensed points of communication that are no longer needed or are included within ALSAT authority. For the reasons stated below, we dismiss the application as defective, without prejudice to re-filing.¹

Section 25.112(a) of the Commission's rules, 47 C.F.R. § 25.112(a), requires the Commission to return as unacceptable for filing any earth station application that is not substantially complete, contains internal inconsistencies, or does not substantially comply with the Commission's rules. For the reasons stated below, Intelsat's application has the following deficiency, which renders the application unacceptable and subject to dismissal:

In item E21 of Schedule B to form 312 Intelsat listed "ALSAT" as the only point of communication and in item E43/44 listed frequencies outside the 5850-6425 MHz (Earth-to-space) and 3625-4200 MHz (space-to-Earth) frequency bands. In its attachment named Exhibit A, Intelsat stated, "Additionally, in Schedule B, Intelsat has removed certain previously licensed points of communication that are no longer needed or are included within ALSAT authority." Authorizations to communicate with ALSAT may be granted only in cases where the earth station is eligible for "routine processing".² The

¹ If Intelsat re-files an application in which the deficiencies identified in this letter have been corrected but otherwise identical to the one dismissed, it need not pay an application fee. *See* 47 C.F.R. § 1.1111(d).

² *See* Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Services in the United States, IB Docket No. 96-111, First Order on Reconsideration, 15 FCC Rcd 7207 (1999), at 7213 ¶13 (stating that licenses for "routine" earth stations providing fixed-satellite service in the conventional C-band or conventional Ku-band may specify

routine processing criteria for an earth station communicating in C-band frequencies are specified in Section 25.212(c) of the Commission's rules, 47 C.F.R. § 25.212 (c). Frequencies outside the 5925-6425 MHz (Earth-to-space) and 3700-4200 MHz (space-to-Earth) frequency bands are not authorized for routine licensing. Because only earth stations that meet routine licensing criteria may be granted ALSAT as a point of communication, Intelsat's application is internally inconsistent and does not substantially comply with the Commission's rules.

Accordingly, pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. §25.112(a)(1), and Section 0.261 of the Commission's rules, 47 C.F.R. §0.261, we dismiss the application without prejudice to re-filing.

Sincerely,

Paul Blais
Chief, Systems Analysis Branch
Satellite Division
International Bureau

"ALSAT" as authorized points of communication, and noting that a "routine" earth station is one that operates consistently with the technical requirements of Part 25).