

Exhibit B

PETITION FOR WAIVER

Intelsat respectfully requests a waiver of Section 25.121(e) of the Federal Communications Commission's ("Commission") rules,¹ which requires that renewals of earth station licenses be submitted no earlier than ninety days, and no later than thirty days, before the expiration date of the license, and petitions the Commission to waive the temporary freeze of fixed satellite service ("FSS") earth station licenses in the 3700-4200 MHz frequency band ("C-band freeze").²

The Commission may grant a waiver for good cause shown.³ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁴ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists for a waiver of both Section 25.121(e) of the Commission's rules and the C-band freeze. Intelsat seeks waiver due to an internal administrative error that resulted in Intelsat filing the attached renewal application shortly after the filing window specified in Section 25.1219(e) closed. Intelsat has taken steps to avoid similar administrative errors in the future. Intelsat's Ellenwood, Georgia earth station E7465 actively supports FSS services. Grant of the requested waivers would ensure that customer services on E7465 will continue uninterrupted and therefore is in the public interest. Further, grant of the requested waivers in the instant case is constant with recent Commission precedent.⁶

Given these particular facts, grant of the waivers sought herein is plainly appropriate.

¹ 47 C.F.R. § 25.121(e).

² Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90 Day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band, Public Notice, DA 18-398 (rel. Apr. 19, 2018).

³ 47 C.F.R. § 1.3.

⁴ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁵ *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁶ See Application of GCI Communication Corp., File No. SES-LIC-20181017-03651 at Exhibit E (granted Mar. 22, 2019) (seeking waiver of Section 25.121(e) and the C-band freeze due to an administrative error); see also Application of GCI Communication Corp., File No. SES-LIC-20181017-03064 at Exhibit E (granted Apr. 30, 2019).