

Exhibit B

SECTIONS 25.137 AND 25.114

The legal and technical qualifications of the Amazonas-3 satellite are currently pending before the Commission and are included herein by reference. Specifically, the legal information requested in Section 25.137 and the technical information requested in Section 25.114, including the Schedule S information, for the Amazonas-3 satellite can be found in the pending request to add the satellite to the Permitted Space Station List. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00912, File No. SAT-PPL-20121018-00183 (Nov. 23, 2012) (Public Notice).

To the extent necessary, however, Intelsat respectfully requests a waiver of the need to provide additional technical information under Section 25.114 of the Commission's rules for its proposed IOT service.¹ The Commission may grant a waiver for good cause shown.² The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.³ 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.⁴ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of Section 25.114. Intelsat has provided in this STA request the technical information that is relevant to the IOT services for which Intelsat seeks authorization. The remainder of the information sought by Section 25.114 is not required to determine potential harmful interference because Intelsat will perform the IOT services on a non-interference basis. Moreover the provision of IOT services will occur while the satellite is located at a temporary IOT location and will be coordinated with all potentially affected operators. In the special circumstance of IOT services, waiver of the need to provide additional technical information under Section 25.114 serves the public interest.

¹ 47 C.F.R. § 25.114.

² 47 C.F.R. §1.3.

³ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁴ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.