

**Before the
Federal Communications Commission
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| |) | MD Docket No. 19-105 |
| Assessment and Collection of Regulatory Fees |) | |
| for Fiscal Year 2019 |) | |
| |) | |

REPLY COMMENTS OF INTELSAT LICENSE LLC

Intelsat License LLC (“Intelsat”) files these Reply Comments in response to comments on the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking (“NPRM”) that seeks input on the Commission’s proposed regulatory fees for fiscal year 2019.¹ Specifically, Intelsat supports the National Association of Broadcasters’ (“NAB”) proposal that the Commission consider adding new entities subject to regulatory fees.²

As both the Commission and NAB note, Section 9(c)(1)(A) of the Communications Act, as recently revised by the RAY BAUM’S Act, no longer uses the term “licensees.”³ In choosing to remove the reference to licensees, Congress has provided the Commission with the opportunity to enlarge its base of regulatory contributors by “reexamin[ing] which entities

¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2019*, Notice of Proposed Rulemaking, MD Docket No. 19-105, FCC 19-37 (rel. May 8, 2019) (“NPRM”).

² See Comments of National Association of Broadcasters, MD Docket No. 19-105 (filed June 7, 2019) at 8-11 (“NAB Comments”).

³ See NPRM at ¶ 9; NAB at 3 (citing Consolidated Appropriations Act, 2018, Pub. L. No. 1150141, Div. P—RAY BAUM’S Act of 2018, §§ 401-404, 132 Stat. 348, 1087-90 (2019)).

should contribute regulatory fees based on how they benefit from the Commission’s activities.”⁴ In light of this opportunity, and in the spirit of equity, Intelsat urges the Commission to consider widening the current regulatory fee constituency to include all parties “that profitably derive direct benefits from Commission proceedings in which they actively participate” as outlined in NAB’s comments.⁵

NAB correctly notes that a number of parties “participate actively in Commission proceedings, generate significant work for Commission staff, and profit from Commission activity without contributing [regulatory] fees to support that activity.”⁶ Many of these parties are heavily involved in several spectrum bands, including bands allocated for satellite use,⁷ therefore generating work for various bureaus.

As a matter of fundamental fairness, all parties that utilize FCC resources should contribute to the recovery costs for these activities rather than having them subsidized by licensees. Intelsat thus supports NAB’s call for the Commission to “undertake a broader review

⁴ NAB Comments at 8.

⁵ *See id.* at 8-11.

⁶ *Id.* at 8.

⁷ *See, e.g.*, Unlicensed Use of the 6 GHz Band, Notice of Proposed Rulemaking, 33 FCC Rcd 10496 (2018).

of the basis for its regulatory fees”⁸ and encourages the Commission to investigate how best to capture all parties that utilize FCC resources in its regulatory fee base.

Respectfully submitted,

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⁸ NAB Comments at 11.