



REDACTED—FOR PUBLIC INSPECTION

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VIA ECFS

September 9, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Satellite Usage Submission of Intelsat License LLC Pursuant to Protective Order

Dear Ms. Dortch,

Pursuant to the instructions and procedures set forth in the Federal Communications Commission's ("Commission") August 26, 2019 *Protective Order*,¹ enclosed please find (1) Appendix A of Intelsat License LLC's ("Intelsat") May 28, 2019 submission filed pursuant to the *Public Notice* released by the Commission in April 2019 requesting information from satellite licensees operating in the 3.7-4.2 GHz band ("C-band");² and (2) the cover letter that accompanied Appendix A when Appendix A was originally filed.

Appendix A contains information responsive to the following requests contained in the *Public Notice*:

- "The total capacity (megahertz) and in terms of the number of megahertz on each transponder that are currently under contract (also provide this data for one month in 2016);"
- "For each day in March 2019, the average percentage of each transponder's capacity (megahertz) utilized and the maximum percentage of capacity utilized on that day. ... For all data reported regarding capacity under contract and capacity utilization, specify the percentage (if any) only for customers outside of the United States;" and

¹ *Expanding Flexible Use of the 3.7-4.2 GHz Band et al.*, GN Docket No. 18-122 et al., Protective Order, DA 19-822 (rel. Aug. 26, 2019) ("*Protective Order*"). When originally filed, Appendix A was accompanied by a request that the Commission withhold from public inspection and afford confidential treatment to confidential information contained in Appendix A. Intelsat's May 28, 2019 submission also included an Appendix B, which does not contain confidential information.

² See *Deadline for Submission of Information on Earth Station and Satellite Use of the 3.7-4.2 GHz Band*, Public Notice, DA 19-278 (rel. Apr. 11, 2019) (the "*Public Notice*"); see also *Expanding Flexible Use of the 3.7 to 4.2 GHz Band, Order and Notice of Proposed Rulemaking*, 33 FCC Red 6915, 6923-25, paras. 16-25 (2018).

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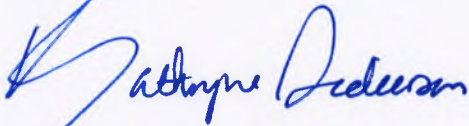
- “Any additional C-band satellites that do not have a currently pending application in IBFS that are planned for launch to serve the United States market and the approximate date of such launch (note whether this satellite is a replacement).”³

Appendix A is designated as Highly Confidential Information and is subject to a request that it be treated as Highly Confidential Information under the *Protective Order*.⁴ Because Appendix A contains Highly Confidential Information and non-confidential information, the Highly Confidential Information has been clearly distinguished via yellow highlighting. The cover letter does not contain Confidential or Highly Confidential Information. It is included herewith because it contains context that is helpful when evaluating the information contained in Appendix A.

As specified in the *Protective Order*, one unredacted, Highly Confidential copy of this filing is being filed with the Secretary’s Office. Two unredacted, Highly Confidential copies of this filing are being hand delivered to Matthew Pearl of the Wireless Telecommunications Bureau. Finally, one copy of the redacted version of this filing is being filed electronically through the Commission’s Electronic Comment Filing System.

Please direct any questions concerning this letter to the undersigned.

Sincerely,



Kathryne Dickerson
Counsel to Intelsat License LLC

Attachments

cc: Matthew Pearl

³ *Public Notice* at 1-2. Intelsat has not included in Appendix A information related to four additional C-band satellites that it would procure should the Commission adopt the proposal put forth by the C-Band Alliance (“CBA”) to repurpose a portion of the C-band for terrestrial 5G use in the on-going C-band proceeding. *See Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Dkt. No. 18-122, FCC 18-91 (rel. 13, 2018); *see also* Letter to Marlene H. Dortch, Secretary, FCC, from Jennifer Hindin, Counsel to the C-Band Alliance, GN Dkt. No 18-122 (Apr. 9, 2019) (attaching the CBA’s Transition Implementation Process).

⁴ As specified in the *Protective Order*, Intelsat sought and obtained a preliminary determination from Commission staff that the information contained in Appendix A meets the requirements set forth in the *Protective Order* to be designated as Highly Confidential.