Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of Comprehensive Review of Licensing and Operating Rules for Satellite Services	IB Docket No. 12-267

COMMENTS OF INTELSAT LICENSE LLC

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TABLE OF CONTENTS

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I. INTRODUCTION AND SUMMARY

Intelsat License LLC ("Intelsat") is pleased to comment on the above-captioned Notice of Proposed Rulemaking ("*Notice*"),[1] in which the Federal Communications Commission ("FCC" or "Commission") seeks to reorganize and to simplify its rules governing the licensing and operation of space stations and earth stations. Intelsat is a member of the Satellite Industry Association ("SIA") and also joins in the separately-filed consensus SIA comments in this proceeding, except where specifically noted.

Intelsat is the leading provider of fixed satellite services ("FSS") worldwide, serving the media, network services, and government customer sectors. Intelsat owns and operates a global satellite system providing space segment capacity offering a wide array of communications services, including voice, video, data, and Internet connectivity. Intelsat's fleet of satellites covers more than 99 percent of the world's populated regions, serving customers that range from

[1] *See Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Notice of Proposed Rulemaking, IB Docket No. 12-267, FCC 12-117 (Sept. 28, 2012) ("*Notice*").

large telecommunications carriers and broadcasters to corporate networks and Internet service providers. Intelsat's customers include distributors that resell capacity, as well as customers that purchase capacity for their own use. Intelsat holds non-common carrier space station authorizations and non-common carrier earth station licenses issued pursuant to Part 25 of the Commission's rules.[2]

Intelsat welcomes the Commission's efforts to review Part 25 of its rules and "modernize the rules to better reflect evolving technology and reorganize and simplify existing requirements for applicants requesting space and earth station licenses."[3] Intelsat also commends the Commission's willingness to help applicants save "time, effort, and costs" by removing unnecessary filing requirements and technical restrictions and by enabling applicants to submit fewer waiver requests.[4]

Intelsat has long advocated initiatives to streamline regulatory requirements for space and earth stations. Commission action now to eliminate redundant and burdensome administrative requirements will serve the public interest by providing applicants and licensees with maximum flexibility to operate efficiently and to embrace technological innovation. Intelsat supports many of the proposals in the *Notice* and urges the Commission to eliminate or to modify certain other proposed rules to best meet the goals of this proceeding.

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[2] Intelsat also holds international Section 214 authorizations and private land mobile radio licenses issued pursuant to other rule parts.

[3] *Notice*, ¶ 3.

[4] *Id.*

II. DISCUSSION

A. The Commission Should Require Only One Certification Pursuant to Section 25.121(d) When a Satellite is Launched and Commences Service

The Commission's rules should require a licensee to file only one certification for each new satellite. Currently, Section 25.121(d) fulfills this objective by requiring a licensee to certify that a:

> satellite has been successfully placed into orbit and that the operations of the satellite fully conform to the terms and conditions of the space station radio authorization.

The *Notice* proposes two additional certifications—a new Section 25.173(b) and revised Section 25.164(f). Each of these rules would be duplicative of the existing rule and should not be adopted.

Adding Section 25.173(b) to the rules would be repetitive with, and necessitate a cumbersome cross-reference in, existing Section 25.121(d).[5] The proposed new Section 25.173(b) would compel the filing of a certification within 15 days of completion of in-orbit testing.[6] However, such testing necessarily is complete when the licensee files the Section 25.121(d) notice noting commencement of service and conformance with the terms and conditions of the space station authorization. Consistent with the streamlining goal of this proceeding, the FCC should consolidate rather than multiply certification requirements—and not add new Section 25.173(b).

Similarly, the proposed revision to Section 25.164(f) would require filing a certification to satisfy the launch or commencement of operation milestone.[7] This proposed certification

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5 *Notice*, ¶ 82

6 *Notice*, ¶ 24.

7 *Notice*, Appendix A, ¶ 28.

already is encompassed by the existing certification requirement under Section 25.121(d). Indeed, satellite operators routinely note in their certifications filed pursuant to Section 25.121(d) that the final milestone has been satisfied and request release of their bonds.[8] Adding another seemingly identical certification requirement belies the purpose of this rulemaking. Accordingly, Intelsat recommends that the FCC simply revise Section 25.164(f) as follows to reference the existing certification required by Section 25.121(d):

> Compliance with a milestone requirement contained in paragraph (a)(4), (b)(4) or (b)(5) of this section may be demonstrated by filing the certification pursuant to Section 25.121(d).

Such streamlining would reduce administrative burdens for both the Commission and applicants without sacrificing the clarity of the milestone certification rules.

B. The FCC Should Not Adopt the Proposal in Section 25.111(d) To Freeze Processing All Applications by Licensees With Unpaid ITU Fees

Intelsat opposes any rule that would freeze the processing of *all* of an entity's satellite and earth station applications based on an unpaid ITU cost-recovery fee for a single satellite. The Commission proposes a new Section 25.111(d) that would codify a licensee's obligation to pay ITU fees for each satellite filing and also would impose a "red light" processing penalty for all Part 25 applications in the event of a past due payment:

> A license granted in reliance on such [an ITU cost recovery] commitment and disposition of any pending or future Part 25 application from the same party will be contingent upon discharge of any such payment obligation.[9]

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[8] *See, e.g.*, Letter from Susan H. Crandall to Marlene H. Dortch, File No. SAT-LOA-20110727-00139 (filed Nov. 27, 2012) (certifying commencement of service of Intelsat 23 satellite and requesting release of bond); Letter from Susan H. Crandall to Marlene H. Dortch, File No. SAT-LOA-20111024-00208 (filed Sept. 20, 2012) (certifying commencement of service of Intelsat 20 satellite and requesting release of bond).

[9] *Notice*, ¶ 41.

Intelsat recognizes the importance of timely payment of ITU cost-recovery fees, but urges the FCC to reject the processing penalty.

First, the record is devoid of any evidence that unpaid ITU cost-recovery fees are of particular concern for the Commission, or have caused any harm. Certainly, the *Notice* does not explain, in paragraphs 40 or 41, the need for, or the basis of, this proposed rule.[10]

Assuming, *arguendo*, a genuine and supportable issue exists, the inflexible policy proposed in the *Notice* would harm the public interest. Unpaid ITU cost-recovery notices may be in error or out-of-date. Moreover, given time-zone differences, it may take some time to contact the ITU to correct an inaccuracy. And, the ITU may have no appreciation of the U.S. regulatory consequences of an unresolved fee dispute. During this time, the International Bureau should not cease processing unrelated space and earth station applications. Doing so would place an FCC licensee's existing U.S. satellite operations in regulatory limbo while the licensee attempts to correct a mistake in Switzerland. The result would be to punish existing U.S. customers on unrelated, in-orbit satellite networks for what may be a bureaucratic error or misunderstanding about an ITU space network filing for a satellite years away from launch.

Intelsat's concern is not merely hypothetical. Intelsat regularly has faced a related problem with respect to the FCC's annual regulatory fees and red light system. Specifically, incorrect regulatory fee records at the FCC have on more than one occasion placed Intelsat improperly in red-light status and caused unwarranted delays in the processing of applications and requests for special temporary authority. In every instance to date in which Intelsat has been red-lighted, Intelsat was subsequently found to have paid its fees correctly; nevertheless, Intelsat

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[10] In a proceeding premised on streamlining current rules by eliminating unnecessary requirements, the Commission should not be adding new rules in the absence of evidence in the record demonstrating a need for such new rules.

applications sat in red-light status during the time it took to resolve the issue.[11] This problem would only be compounded if the Commission adopts its proposal to apply red-light status to allegations of non-payment of ITU fees. The FCC should not jeopardize unnecessarily the operations of U.S. licensees—and their customers—in this manner.

Instead, the FCC should ensure payment of ITU regulatory fees in a less drastic manner. Specifically, the FCC should limit the hold on application processing to the specific satellite associated with the alleged unpaid ITU cost-recovery obligation. The Commission easily can do this by deleting the phrase "and disposition of any future or pending Part 25 application from the same party," from its proposed new Section 25.111(d). In this way, should an entity's ITU cost recovery payments be in doubt, the specific license involved would be at risk of being red-lighted—but only that license. Other licenses or authorizations held by the same entity would not be "frozen," and the Commission would continue processing applications unrelated to the fee dispute—for example for earth stations needed to support customer services on a different satellite.

In addition, the FCC may rely on its existing enforcement authority to investigate and, if necessary, collect an unpaid ITU fee. Specifically, if an ITU fee remains unpaid 90 days after the due date, the International Bureau could refer the matter to the Enforcement Bureau for

[11] For example, Intelsat just discovered that a former Intelsat licensee entity has recently been red-lighted due to alleged non-payment of a 2012 earth station regulatory fee. Intelsat twice before has been red-lighted and successfully contested inaccurate regulatory fee bills for this *same antenna*. The antenna in question was surrendered in 2009 and Intelsat has been improperly red-lighted every year since, despite having provided evidence—twice—that the license was surrendered.

investigation and, if necessary, issuance of a Notice of Apparent Liability. Such an approach would be analogous to the FCC's enforcement of unpaid universal service fund ("USF") fees.[12]

By adopting these proposals, the Commission would better fit the punishment to the alleged crime. Moreover, it would reduce drastically the risk that an error or misunderstanding between a U.S. licensee and the ITU will cause an unwarranted denial of, or delay in, service to an applicant's customers.

C. The Commission Properly Proposes to Replace Orbital Debris Narratives with a Certification Process In Section 25.114(d)(14)

Intelsat supports the Commission's proposal to replace the existing narrative requirements for orbital debris mitigation disclosure with a more efficient certification procedure. The Commission recommends amending Section 25.114(d)(14) to clarify and to simplify the orbital debris disclosure process.[13] Intelsat agrees that the requirement to produce detailed statements impose unnecessary burdens of time and cost. Moreover, many current orbital debris statements already simply repeat the rule's requirements and certify the applicant's compliance with this rule. The proposed certification will provide the same information without requiring applicants to prepare, or Commission staff to read, lengthy narratives that do not enhance the disclosure process.

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12 *See, e.g.*, *Telseven, LLC*, Notice of Apparent Liability, FCC 12-62 (Jun. 4, 2012); *NTS Communications, Inc.*, Notice of Apparent Liability, 25 FCC Rcd 5137 (2010); *ADMA Telecom, Inc.*, Notice of Apparent Liability for Forfeiture, 24 FCC Rcd 838 (2009).

13 *Id.* at ¶ 75.

D. The FCC Should Add Satellite Positioning Flexibility to the Fleet Management Rule in Section 25.118(e)(1)

Intelsat concurs with the Commission's proposal to clarify that compliance with coordination agreements as required by fleet management procedures includes coordination of orbital station-keeping ranges.[14]

Beyond that, Intelsat encourages the Commission to broaden the utility of the fleet management rule by amending Section 25.118(e)(1) to include the word "nominal" as follows:

> [t]he space station licensee will relocate a Geostationary Satellite Orbit (GSO) space station to another nominal orbit location that is assigned to that licensee.[15]

Currently, the fleet management procedure may be invoked only when relocating a satellite to the precise orbital location already occupied by one of the licensee's satellites. In practice, however, space station operators often offset slightly satellites to facilitate safe station-keeping during traffic transition and simultaneous operation of space stations at the same nominal orbital location. For this reason, among others, the fleet management procedure rarely is used today.

Consistent with the instant proceeding's goal to streamline satellite application procedures, the fleet management rule was adopted to "expedite grant of modification applications that do not involve increased interference potential."[16] Operation at a nominal, rather than exact, orbital location will negligibly affect the interference potential. Should operation offset from a licensee's specified orbital position adversely impact the interference environment, the licensee would not be able to make the necessary certification regarding compliance with coordination agreements and could not file pursuant to fleet management

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14 *Id.* at ¶ 79.

15 *Id.*

16 *Space Station Licensing Rules and Policies*, Second Report and Order, 18 FCC Rcd 12507, 12509 (2003).

procedures. Thus, amendment of the rule to permit relocation to a nominal rather than precise orbital location will enhance the utility of the rule without increasing the risk of harmful interference.

E. The Commission Should Streamline Grant of Non-substantial Satellite Relocation or Beam Repositioning in a new Section 25.117(h)

Intelsat proposes a new provision, Section 25.117(h), to streamline the license modification request grant procedure. The Commission's adoption of this provision would enhance the speed at which operators flexibly can offer services from existing geostationary orbit satellites to consumers, and save time and cost for licensees and the Commission.

> *Proposed New Section 25.117(h):* An application to make any of the following modifications to a geostationary satellite orbit space station license will be deemed granted 35 days after the date of the public notice that the request has been accepted for filing, provided no objection is filed during the 30-day notice period.
>
> (1) Relocation by no more than 0.20 degrees from the satellite's initially authorized orbital location; or
>
> (2) Repositioning of one or more beams at the satellite's initially authorized locations by no more than 0.3 degrees in any direction relative to the satellite's initially authorized beam position, whereby the specific beam to be repositioned must be specified as well as the frequency band(s) associated with that beam; or
>
> (3) Rotation of one or more beams at the satellite's initially authorized orbital location by no more than 0.3 degrees in any direction relative to the satellite's initially authorized beam position, whereby the specific beam(s) to be rotated must be specified as well as the frequency band(s) associated with that beam.
>
> For such modification requests, the licensee is required to provide only the information requested in Sections 25.114 (c)(1), (2), (3) and (5). In (1), (2) and (3) above, the expressions "initially authorized orbital location" and "initially authorized beam position" refer to the initial satellite authorization for the current nominal orbital location, without use of Section 25.117(h).

A satellite operator provides extensive technical information in the application for the satellite's initial authorized location. Minor changes to a satellite's orbital location, beam position or beam rotation are unlikely to cause harmful interference. Adoption of this proposed

Section 25.117(h) will further the purpose of this rulemaking by expediting a licensee's ability to make minor technical changes and increase flexibility to respond to customer requirements.

F. Technical Proposals

1. *Eliminate FCC Form Schedule S in Section 25.114(c)*

In the *Notice*, the Commission proposes retaining FCC Form Schedule S, which primarily contains the spacecraft's technical information.[17] Intelsat recommends that the Commission discontinue the use of FCC Form Schedule S and strike the references to Schedule S in Part 25 of the Commission's rules.[18]

All of the information requested on Schedule S may be provided in narrative form. Indeed, Intelsat already provides full technical information for a space station in an Engineering Statement and then duplicates that information in the Schedule S. Other applicants provide a portion of the space station's technical information in the Engineering Statement and other portions in the Schedule S. The goals of this rulemaking are best served by a rule that requires all space station technical information to be submitted in a single narrative, not two different places.

An applicant can describe more fully in an Engineering Statement all of the spacecraft's technical characteristics and expand on various aspects of its application, such as waivers. Producing the Schedule S is also very time consuming. Moreover, it is unclear to Intelsat what advantage the information contained in Schedule S versus in an Engineering Statement provides to an interested party in determining the impact of the proposed space system on another authorized station. Accordingly, Intelsat suggests that the Commission discontinue the use of

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17 *Id.* at ¶ 49.

18 *See* 47 C.F.R. §§ 25.114(a), 25.114 (b), 25.114(c), 25.116(e) and 25.117(c) (2011).

Schedule S and strike the references to Schedule S that appear in Part 25 of the Commission's rules. Implementation of this proposal will require that any relevant items that have to be included in Schedule S as per Section 25.114(c) be added to Section 25.114(d).

2. *Eliminate "Concrete Proposal" Sentence from Section 25.114(b)*

Intelsat proposes that the Commission delete the first sentence of Section 25.114(b), which requires an applicant to provide a "concrete proposal" for Commission evaluation.[19] The immediately preceding subsection, Section 25.114(a), requires the submission of "[a] comprehensive proposal. . . ."[20] The requirement for a concrete proposal is superfluous and can only cause confusion regarding whether there is any difference in the meaning of the terms "comprehensive" and "concrete." Plainly, space station applicants must provide all of the legal and technical information required by Section 25.114; a sentence stating that this information constitutes a "concrete" proposal is unnecessary—particularly when the rule already requires a "comprehensive proposal."

3. *Revise Coverage Contour Proposal in Section 25.114(c)(4)(vi)*

The Commission proposes that for geostationary orbit satellites all antenna coverage contours be provided in GIMS-readable format.[21] The Commission should not adopt this proposal and instead should require applicants to show the coverage contours of each of their space station antenna(s) on a flat Earth projection area map.

The current rules do not place any restrictions on the map projection in which the coverage contours of a space station antenna can be presented. For this reason, applicants have

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19 *See* 47 C.F.R. § 25.114(b) (2011).

20 47 C.F.R. § 25.114(a) (2011).

21 *Notice*, ¶ 67.

provided patterns on flat Earth and non-flat Earth projection area maps. The use of non-flat Earth projection maps makes it difficult for other system operators to evaluate the impact of the proposed geostationary satellite system on their networks. By providing the coverage contours of each satellite antenna on a flat Earth projection, other system operators can clearly see how a specific coverage contour is projected on the ground and consequently determine the interference impact on their system resulting from the proposed space system. Therefore, the proposed requirement to present antenna gain contours in an electronic format, such as GIMS, reduces the value of this information to other operators.[22] Moreover, the submission of antenna gain information in GIMS format also requires that other interested parties—both satellite and terrestrial operators—obtain appropriate software to read and display the GIMS data on a map. Consistent with the goals of this proceeding, the Commission should not impose additional costs on U.S. applicants when the expenditure of those costs reduces, rather than enhances, the value of the information presented.

For the foregoing reasons, as long as the beam contours of the proposed space station are provided on a flat Earth projection area map, the submission of GIMS formatted antenna gain contour data is unnecessary. Intelsat's proposal is consistent with its recommendation that the Schedule S should be discontinued. Currently, GIMS-readable data is only contained in the Schedule S.

4. *Eliminate Information Requirement of Section 25.114(d)(7)*

In the *Notice*, the Commission proposes retaining the requirement for fixed-satellite service space station applicants to include the information specified in Section 25.140(b)(2)

[22] The submission of antenna gain information in GIMS format is also of limited value in determining compliance with PFD limits, since the applicant already provides the PFD calculations as part of its overall engineering showing.

pursuant to Section 25.114(d)(7).[23] Intelsat recommends that this requirement be deleted. The rationale behind Intelsat's recommendation is contained in its comments concerning the Commission's proposal for Section 25.140(b)(2), set forth below.

5. *Eliminate Information Requirement of Section 25.140(b)(2)*

In the *Notice*, the Commission proposes substantially to maintain the current Section 25.140(b)(2) provisions.[24] Under this rule section, an applicant for a fixed-satellite space station license must provide an interference analysis to demonstrate the compatibility of its proposed system with respect to authorized stations within two degrees of any proposed satellite point of communication.[25] Moreover, the applicant is required to provide details of its proposed radio frequency carriers, which it believes should be taken into account in its analysis.[26] Further, the applicant must include, for each type of radio frequency carrier, the link noise budget, modulation parameters, and overall link performance.[27]

These requirements are unnecessary. When an applicant applies for a fixed-satellite license, it already has researched the operating parameters of existing and proposed satellites in the vicinity of the proposed orbital location. Based upon this research, the applicant determines that it can operate satisfactorily within the expected interference environment and that it can operate in a manner that is compatible with the FCC's two-degree spacing requirements and/or that it is confident that it can coordinate its operations with other co-frequency adjacent satellite

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23 *Id.* at Appendix A ¶ 6.

24 *Id.* at ¶ 112.

25 *Id.* at Appendix A ¶ 19.

26 *Id.*

27 *Id.*

operators if it needs to operate in excess of the two-degree limits. Accordingly, there is no technical rationale for the Commission to require the applicant to demonstrate the compatibility of its proposed system with other authorized stations located within two degrees of its proposed location.

Provision of the information requested in Section 25.140(b) is not necessary to protect adjacent satellite operations. In practice, an adjacent U.S.-licensed operator would be protected by the application of two-degree spacing rules. Operation in excess of the two-degree limits is not allowed unless such operations are coordinated among satellite operators. Moreover, the analysis presented in the application is often hypothetical because it is not based on actual operations. As such, the interference analysis is based on assumptions made by the applicant that may or may not accurately reflect the operational environment at the time that the applicant for the proposed satellite files its application. Finally, the interference analysis is extremely time consuming for the applicant to prepare and, presumably, for the FCC staff to review. Accordingly, the Commission should eliminate the Section 25.140(b)(2) requirement in order to further its stated goal of helping applicants save "time, effort, and costs" by eliminating unnecessary requirements.

6. *Eliminate Section 25.202(g) TT&C Restriction*

In the *Notice*, the Commission invites comment about whether to amend Section 25.202(g) to allow satellite operators to transmit TT&C signals in portions of the assigned bands other than the edges.[28] Section 25.202(g) requires U.S. domestic satellites to conduct TT&C at either or both edges of the allocated band(s).[29] Intelsat proposes eliminating Section 25.202(g).

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[28] *Id.* at ¶ 121.

[29] *See* 47 C.F.R. § 25.202(g) (2011).

It is not clear what purpose the TT&C band-edge requirement serves. TT&C carriers occupy relatively small bandwidths (approximately one megahertz for each command carrier and 500 kHz for each telemetry carrier) and, therefore, would not necessarily adversely impact communication frequencies. Indeed, there is no such restriction on the placement of TT&C for non-U.S. licensed satellites with which many U.S.-licensed satellite operators have to coordinate. Nevertheless, non-U.S. licensed satellites and U.S. licensed satellites still achieve coordination and are able to control their satellites without apparent harmful interference. A further reason to eliminate this rule is that the limited spectrum available at the edges of an allocated band can result in cases of TT&C carrier incompatibility between two closely spaced spacecraft where there is frequency overlap between the TT&C carriers.

Intelsat recognizes that SIA has proposed revisions to rule 25.202(g). Intelsat believes that SIA's proposal is a step in the right direction, but does not go far enough. SIA's proposal would continue to require satellite operators to design their satellites to place TT&C frequencies used during emergencies at the band edges of allocated frequency bands—a requirement that serves no discernible purpose for the reasons set forth above. For the foregoing reasons, Intelsat believes that the Commission should eliminate entirely the TT&C band-edge requirement and allow operators to place TT&C carriers as they deem appropriate.

7. *Eliminate Section 25.211(a) Analog Video Transmission Restriction*

In the *Notice*, the Commission proposes retaining Section 25.211(a), which requires downlink analog video carriers in the band 3700-4200 MHz to be transmitted only on a center frequency of 3700+20N MHz, where N=1 to 24, with the corresponding uplink frequency being 2225 MHz higher.[30] Intelsat proposes eliminating Section 25.211(a).

[30] *See* 47 U.S.C. § 25.211(a) (2011).

The intent of this rule was to reduce the likelihood of analog video interference between two co-frequency adjacent satellites operating with opposite polarization schemes.[31] However, this rule has outlived its usefulness. Satellite operators have been able to coordinate operation of analog video carriers that do not conform with the provisions of Section 25.211(a). Satellite operators currently operate satellites that utilize transponders of varying bandwidths, *e.g.*, 36, 72, 112 MHz—not just less than 24 MHz. With respect to the wider bandwidth transponders, placement of analog video carriers at the frequencies mandated by this rule may lead to a non-optimal use of the transponder, especially when the transponder is used to carry both analog video and SCPC traffic and the placement of carriers within a transponder is an effective tool in reducing third order intermodulation interference—a form of self-interference. For the foregoing reasons, Intelsat proposes that the Commission delete Section 25.211(a).

[31] *Amendment of Part 25 of the Commission's Rules and Regulations to Reduce Alien Carrier Interference Between Fixed-Satellites at Reduced Orbital Spacings and to Revise Application Processing Procedures for Satellite Communication Services*, Second Report and Order and Further Notice of Proposed Rulemaking, 8 FCC Rcd 1316, 1320-21 (¶¶ 26-28) (1993).

III. CONCLUSION

Intelsat is pleased to support the FCC's streamlining efforts. Towards that end, Intelsat urges the FCC to adopt the proposed recommendations, amendments, and revisions to the rules discussed herein.

Respectfully submitted,

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