

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch
and Operate Intelsat 43 (S3094) at
137.1° W.L.

File No. SAT-LOA-20210611-00079

File No. SAT-AMD-_____

**APPLICATION OF INTELSAT LICENSE LLC FOR AUTHORITY
TO LAUNCH AND OPERATE INTELSAT 43 AT 137.1° W.L.**

Intelsat License LLC (“Intelsat”), pursuant to Sections 25.110(b)(3)(i) and 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby seeks authority to launch and operate a new Ku-/Ka-/Q-/V-band software-defined satellite (“SDS”), to be known as Intelsat 43, at the 137.1° W.L. orbital location. Intelsat 43 is scheduled for launch in the first half of 2026 and will operate on a non-common carrier basis.²

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed new satellite. Moreover, grant of this application will serve the public interest by adding new Ku-, Ka-, Q-, and V-band services at the 137.1° W.L. orbital location. In accordance

¹ 47 C.F.R. §§ 25.110(b)(3)(i); 25.114. Intelsat is filing this Application to Launch and Operate as an Amendment in ICFS because it is the closest “Classification of Filing” (ICFS Form 312, Box 17) that can be selected for a new application made pursuant to 25.110(b)(3)(i).

² Section 310(b) is not applicable to this Application because Intelsat 43, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis. *See Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation LLC, Carlyle PanAmSat I, LLC, et al. (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 n. 5 (Int’l Bur. 2004).

with the Commission's rules,³ this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

I. INTELSAT IS QUALIFIED TO HOLD THE REQUESTED AUTHORIZATION

A. Legal Qualifications

Intelsat is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat's compliance with the Commission's basic legal qualifications. In addition, Intelsat already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.⁴

B. Technical Qualifications

In the attached Form 312, Schedule S, and Engineering Statement, Intelsat demonstrates that it is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information required by Section 25.114 of the Commission's rules.⁵ In addition, the Engineering Statement provides information demonstrating Intelsat's compliance with the Commission's orbital debris mitigation rules.⁶

C. Operational Frequencies

The following chart shows the frequencies that will be used by the Intelsat 43 satellite at the 137.1° W.L. orbital location:

³ 47 C.F.R. §§ 25.110(b)(3)(i); 25.114(c).

⁴ *See Intelsat S.A., as debtor-in-possession, (Transferor) and New TopCo S.A. (Transferee)*, Order, IB Docket No. 21-375, DA 22-162, ¶ 14 (rel. Feb. 16, 2022) (“[W]e find that the Applicants are qualified to hold Commission licenses.”).

⁵ *See* 47 C.F.R. § 25.114.

⁶ 47 C.F.R. § 25.114(d)(14); *see also Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

Frequencies:	Ku-band Frequencies: 10.7-10.95 GHz (space-to-Earth) 10.95-11.7 GHz (space-to-Earth) 11.7-12.2 GHz (space-to-Earth) 12.2-12.5 GHz (space-to-Earth) 12.5-12.75 GHz (space-to-Earth) 13.0-13.25 GHz⁷ (Earth-to-space) 13.75-14.5 GHz (Earth-to-space) 14.5-14.8 GHz (Earth-to-space) Ka-band Frequencies: 17.3-17.7 GHz (space-to-Earth) 17.7-17.8 GHz (space-to-Earth) 17.8-18.8 GHz (space-to-Earth) 18.8-19.3 GHz (space-to-Earth) 19.3-19.4 GHz (space-to-Earth) 19.6-20.2 GHz (space-to-Earth) 27.5-28.6 GHz (Earth-to-space) 28.6-29.1 GHz (Earth-to-space) 29.1-29.5 GHz (Earth-to-space) 29.5-30.0 GHz (Earth-to-space) Q-band Frequencies: 37.5-42.5 GHz (space-to-Earth) 42.5-43.5 GHz (space-to-Earth) V-band Frequencies: 47.2-50.2 GHz (Earth-to-space) 50.4-51.4 GHz (Earth-to-space) 51.4-52.4 GHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) frequencies: 10.7-12.75 GHz (space-to-Earth) 13.75-14.8 GHz (Earth-to-space)
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⁷ In 2022, the Commission issued a public notice freezing new license and modification applications in the 12.7-13.25 GHz band. See *180-Day Freeze on Applications for New or Modified Authorizations for the 12.7-13.25 GHz Band*, Public Notice, DA 22-974, 1 (Sept. 19, 2022); *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, Notice of Inquiry and Order, FCC 22-80, ¶ 44 (Oct. 28, 2022) (extending the freeze pending the outcome of HN Docket No. 22-352). Intelsat filed for use of the 13.0-13.25 GHz as part of its two-step space station application in 2021, and thus the freeze on new license or modification applications in the 12.75-13.25 GHz band does not apply.

Intelsat 43 is equipped with two tunable command receivers and four tunable telemetry transmitters. The center command frequency on each receiver and transmitter is selectable via ground command in 100 kHz steps within the 10.7-12.75 GHz and 13.75-14.8 GHz frequency range, respectively. Consistent with the satellite's design, Intelsat seeks authority to operate TT&C anywhere within these bands.⁸

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Intelsat currently plans to add four SDS satellites to its geostationary fleet. SDS design replaces traditional satellite hardware components with software-defined components, which allows for a new level of on-orbit customization that is not available on traditionally designed satellites. Instead of traditional satellite transponders that employ static beam configurations for the life of the satellite, Intelsat 43 will employ a digital transparent processor ("DTP") in place. The DTP, along with advanced algorithms, and phased array antenna technologies will allow for dynamic digital beam forming on-orbit, which enables the creation of channels of beams that are flexible in size, shape, power, and bandwidth. Intelsat 43 will be equipped with separate transmit and receive active array user beam antennas instead of parabolic receive and transmit antennas. This new paradigm in payload technology will allow Intelsat to dynamically create a large number of shapeable and steerable beams on Intelsat 43, after the satellite is on-orbit. This enhances Intelsat's ability to create connectivity where and when it is needed by customers. Thanks to these changes, Intelsat 43 will be able to create new beams, change the shape of beams, change the allocation of power within a beam, allocate capacity, and change frequencies via software commands from the ground. Additionally, SDS satellites, including Intelsat 43, will be more seamlessly integrated into combined space-ground network end-to-end solutions and advanced

⁸ See Engineering Statement at § 2.3.

orchestration and management systems will keep the SDS satellites in constant contact with the hub, smart edge terminals, and local and wide-area networks to flexibly adjust to the users' evolving connectivity needs.

Intelsat's standards-based, open-architecture network design facilitates the incorporation of the best technology at any given time, further bolstering network resiliency. The addition of the SDS Intelsat 43 at 137.1° W.L. into Intelsat's network will serve the public interest by enhancing interoperability with neighboring networks and allowing Intelsat to dynamically respond to changing user requirements—from inflight WiFi on commercial airlines to critical government communications and disaster recovery—and by making new, dynamically allocated capacity available to service customers in the Americas, Caribbean, and Pacific Ocean region. Since Intelsat 43 will have the ability to rapidly adjust beam positions and intensity in response to changing user needs, the new capacity will benefit customers by enabling Intelsat to meet customer network growth more cost effectively. Further, the Intelsat 43 satellite's ability to dynamically allocate resources will allow Intelsat to utilize spectrum more efficiently. For these reasons, grant of this Application is therefore in the public interest.

III. MILESTONE AND BOND REQUIREMENTS

Section 25.165(f) of the Commission's rules requires a surety bond, referred to as the "application-stage bond," when an applicant submits a Coordination Request with the Commission pursuant to Section 25.110(b)(3)(ii) procedures for two-step space station applications.⁹ The Commission "will release the application-stage bond upon finding that a timely

⁹ 47 C.F.R. § 25.165(f) ; *see also Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Second Report and Order, 30 FCC Rcd 14713, ¶¶ 25-34 (2015) ("Part 25 Streamlining Second Report and Order").

filed application is acceptable for filing.”¹⁰ Once the application has been granted, GSO licensees are subject to a post-licensing bond as provided under Section 25.165(a) of the Commission’s rules.¹¹

Intelsat requests that the Commission permit Intelsat to release its application-stage bond upon accepting this application for filing.¹² Additionally, Intelsat acknowledges that Intelsat 43 will be subject to the milestone and bond posting requirements set forth in Sections 25.164 and 25.165 of the Commission’s rules, respectively.¹³

IV. WAIVER REQUESTS

Intelsat requests waiver of the United States (“U.S.”) Table of Frequency Allocations provided in Section 2.106 of the Commission’s Rules¹⁴—specifically, (a) footnote NG52, which limits the use of the 10.7-11.7 GHz frequency band by non-federal fixed satellite service (“FSS”) to international systems;¹⁵ (b) the service allocation of the 12.2-12.7 GHz and 17.3-17.7 GHz frequency bands, which allocates the bands to broadcast satellite service (“BSS”) and fixed service

¹⁰ *Part 25 Streamlining Second Report and Order* ¶ 32.

¹¹ *See* 47 C.F.R. § 25.165(a)(2); *see also Part 25 Streamlining Second Report and Order* ¶ 32.

¹² The frequencies identified on the application-stage bond posted for Intelsat 43 are consistent with the frequencies identified on the FCC’s informative notice regarding Intelsat’s request for coordination of the USABSS-50, USASAT-85A, and USASAT-101G ITU filings at the nominal 137° W.L. orbital location. *See Policy Branch Information, Actions Taken*, Report No. SAT-01567, File No. SAT-LOA-20210611-00079 (July 16, 2021) (Public Notice). This public notice—and consequently, the Intelsat 43 bond—inadvertently included the 13.25-13.75 GHz band. Intelsat did not apply for use of the 13.25-13.75 GHz band as part of its first-step application, nor was it submitted to the ITU in connection with Coordination Requests for use of the above-listed ITU filings. Similarly, this application does not request use of the 13.25-13.75 GHz band. As a result of this administrative error, Intelsat requests that the FCC issue any waivers necessary to release the bond.

¹³ 47 C.F.R. §§ 25.164(a), 25.165(a).

¹⁴ 47 C.F.R. § 2.106.

¹⁵ 47 C.F.R. § 2.106, fn. NG52. Footnote NG52 was formerly footnote NG104.

(“FS”); (c) the allocation of the 12.7-12.75 GHz frequency band, which allocates the band to FS and FSS in the Earth-to-space direction in International Telecommunication Union (“ITU”) Region 2; (d) the allocation of the 14.5-14.8 GHz frequency band, which limits the use of the band to federal users in ITU Region 2; (e) footnote NG166,¹⁶ which limits use of the 29.1-29.25 GHz band to feeder links for non-geostationary-satellite systems in the mobile satellite service (“MSS”) within the United States; and (f) the service allocation for the 42.0-43.5 GHz band, which allocates the band to non-federal radioastronomy.

Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”¹⁷ Good cause exists if “special circumstances warrant a deviation from the general rule and such deviation will serve the public interest” better than adherence to the general rule.¹⁸ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”¹⁹ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Additionally, waiver of the Table of Frequency Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency Allocations and when the nonconforming operator accepts any interference from authorized services.”²⁰

¹⁶ 47 C.F.R. § 2.106, fn. NG166.

¹⁷ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹⁸ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁹ *WAIT Radio*, 418 F.2d at 1159.

²⁰ See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd

A. Footnote NG52

Good cause exists to waive the international only requirement for the bands 10.7-11.7 GHz (space-to-Earth) on Intelsat 43. The purpose of NG52 is to limit the number of the FSS earth stations with which the co-primary FS operators would need to coordinate.²¹ The Commission has found that waiving NG52 will not undermine the purpose of the rules if the party seeking a waiver: (1) will be utilizing earth stations that are receive-only in these bands and thus “not capable of causing interference into FS stations” operating in the bands; and (2) agrees to “accept any level of interference from FS stations” in these bands.²²

With respect to the 10.7-11.7 GHz band, grant of the requested waiver satisfies these criteria and would be consistent with precedent.²³ The earth stations operating in both these bands with Intelsat 43 are receive-only with respect to the bands and Intelsat agrees to accept any level of interference into those earth stations receivers from FS stations in the band. Intelsat will provide services in the 10.7-11.7 GHz frequency band only on a non-interference/non-protected basis. Accordingly, the earth stations operating in this band pose no interference concerns with

2860 (Int’l Bur. 1995) (authorizing MSS in the C-band); *see also Application of Motorola Satellite Communications, Inc. for Modification of License, Order and Authorization*, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

²¹ *See Satellite Services*, 26 RR 2d 1257, 1263-65. *See also EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83° W.L. Orbital Location*, Order and Authorization, DA 04-3162, 9 (Int’l Bur., Sept. 30, 2004) (“[A] satellite may provide downlink service into the United States and its Possessions (US&P) in the 10.95-11.2 GHz and 11.45-11.7 GHz only if the uplink originates outside the US&P.”) (“EchoStar 83° Waiver”).

²² EchoStar 83° Waiver at ¶ 13.

²³ *See, e.g., DIRECTV Enterprises, LLC, Fleet Management Notice for SKY-B1 Satellite*, File No. SAT-MOD-20170221-00019, Condition 10 (stamp grant, reissued May 11, 2017).

respect to co-frequency FS stations and therefore will not need to be coordinated with FS stations located within the United States and its territories.

Intelsat also agrees to abide by the customer notification requirements that the International Bureau has previously imposed when granting waivers of NG52.²⁴ Intelsat will inform its customers in writing, including any customers receiving end-user services from resellers accessing capacity on Intelsat 43, of the potential for interference from FS operations in the 10.7-11.7 GHz band.

B. 12.2-12.7 GHz and 17.3-17.7 GHz

Good cause exists to grant a waiver of the Table of Frequency Allocations to permit Intelsat 43 to utilize the bands 12.2-12.7 GHz (space-to-Earth) and 17.3-17.7 GHz (Earth-to-space) for FSS on a non-interference/non-protected basis in ITU Region 2, including the United States. Waiver of Section 2.106 to permit Intelsat 43 to operate in these frequency bands is in the public interest because it will facilitate efficient use of these bands without causing harmful interference to terrestrial FS stations or BSS operations.

Intelsat 43 is 8° from the nearest operational BSS satellite with access to the U.S. market that is operating in the 12.2-12.7 GHz band and 17.3-17.7 GHz band. At this orbital separation, there is minimal risk of harmful interference from Intelsat 43 to BSS networks.²⁵

²⁴ See, e.g., *Intelsat North America Request for Waiver*, File No. SAT-MOD-20050610-00122, Condition 3 (stamp grant with conditions issued Sept. 30, 2005); *EchoStar 83° Waiver* at ¶ 13.

²⁵ See *Application for Authority to Operate Replacement Payloads of the EUTELSAT 172B Satellite in the 3700-4200 MHz, 5925-6425 MHz, 10.95-11.20 GHz, 11.45-11.7 GHz, 12.2-12.75 GHz and 14.0-14.5 GHz bands at 172.0° E.L.*, Stamp Grant, File No. SAT-RPL-20170927-00136 (granted Apr. 25, 2018) (finding that waiver was “justified because FSS operations in these bands are consistent with No. 5.492 of the ITU Radio Regulations and there are no U.S. BSS satellites transmitting from orbital locations within 50° of the 172° E.L. orbital location.”).

Additionally, Intelsat 43 operations will be compatible with any current and future non-geostationary orbit FSS operations in the 12.2-12.7 GHz frequency band in ITU Region 2 that receive a “favourable” or “qualified favourable” finding in accordance with Recommendation 85 (WRC-03) and certify compliance with applicable equivalent EPFD limits in Article 22 of the ITU Radio Regulations (“ITU RR”).²⁶ Moreover, Intelsat 43 operations in the 12.2-12.7 GHz band will be on a non-interference/non-protected basis within the United States and outside of the United States Intelsat will conform with all applicable coordination agreements and in accordance with the Appendix 30 Plan and footnote 5.492 of the ITU Radio Regulations.

As these frequencies will be used with relatively large earth stations with low downlink Equivalent Isotropically Radiated Power (“EIRP”) densities and low power densities at the earth station input in the United States, coordination is expected to be triggered with a very limited number of assignments or proposed modifications. Intelsat will endeavor to complete all required coordination agreements. In case any of these coordination agreements are not completed, the corresponding operation of Intelsat 43 in ITU Region 2 BSS Plan frequencies will be conducted on a non-interference/non-protected basis.

C. 12.7-12.75 GHz

Good cause exists to waive Section 2.106 to permit Intelsat 43 to downlink in the 12.7-12.75 GHz frequency band in Region 3. Intelsat’s use of these frequencies will be limited to ITU Region 3 and therefore will be in conformance with the 12.7-12.75 GHz Region 3 allocation.

²⁶ 47 C.F.R. § 2.106, No. 5.487A. *See, e.g., WorldVu Satellites Limited LLC*, Order and Declaratory Ruling, 32 FCC Rcd 5366, ¶ 24(d) (2017).

Further, Intelsat is not aware of any nearby geostationary space station in ITU Region 2 receiving in the 12.7-12.75 GHz frequency band. Intelsat 43's operations will be in conformance with the 12.7-12.75 GHz Region 3 allocation.

D. 14.5-14.8 GHz

Good cause exists to waive Section 2.106 for Intelsat 43 use of the 14.5-14.8 GHz (Earth-to-space). The purpose of Section 2.106 is to harmonize the use of spectrum and thereby reduce harmful interference to allocated services within the United States and ITU Region 2. The 14.5-14.8 GHz band is allocated to FSS (Earth-to-space) in ITU Region 2, but the U.S. Table of Frequency Allocations limits use of the band to federal users. Intelsat 43 will not cause harmful interference into federal users because Intelsat will not transmit in the 14.5-14.8 GHz frequency band from earth stations located inside of the United States. Further, Intelsat 43 will accept interference from federal users in the band.

E. Footnote NG166

Good cause exists to waive the limitation on use of the 29.1-29.25 GHz band. In the United States use of the 29.1-29.25 GHz band is limited to feeder links for non-geostationary-satellite systems in the MSS. Intelsat is seeking to operate Intelsat 43 in this frequency band outside of the United States, consistent with the band's ITU allocation. Intelsat 43 will not transmit in the 29.1-29.25 GHz frequency band from earth stations located inside of the United States. Further, any earth station located outside the United States will be coordinated with non-geostationary-satellite MSS systems in accordance with ITU Radio Regulations.

F. 42.0-43.5 GHz

Good cause exists to waive the limitation on use of the 42.0-43.5 GHz band. In the United States non-federal use of the 42.0-43.5 GHz band is limited to radioastronomy. The band also includes federal FS, FSS, mobile and radio astronomy allocations. Intelsat is seeking to operate

Intelsat 43 in this frequency band outside of the United States, consistent with the band's ITU allocation. Intelsat 43 will not cause harmful interference into users in the United States because Intelsat will not transmit in the 42.0-43.5GHz frequency band from earth stations located inside of the United States. Further, Intelsat 43 will accept interference from federal users in the band. Consistent with footnote US342 of the U.S. Table of Allocations Intelsat will take all practicable steps to protect the radio astronomy service from harmful interference.²⁷

V. CONCLUSION

Based on the foregoing, Intelsat respectfully requests that the Commission grant this satellite application.

Respectfully submitted,

Intelsat License LLC

By: /s/ Cynthia J. Grady

W. Ray Rutngamlug
Associate General Counsel

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

June 12, 2023

²⁷ 47 C.F.R. § 2.106, fn. US342.

Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved Intelsat's ownership structure, including foreign ownership.¹ There have been no material changes to Intelsat's ownership since the *2022 Intelsat Order*.

¹ See *Intelsat S.A., as debtor-in-possession (Transferor) and New TopCo S.A. (Transferee)*, Order, IBFS File No. SAT-ASG-20210826-00117, IB Docket No. 21-375, DA-22-162 (rel. Feb. 16, 2022) ("*2022 Intelsat Order*").

Exhibit B

FCC Form 312, Response to Question 40: Officers, Directors, and Ten Percent or Greater Shareholders

Intelsat License LLC is a Delaware limited liability company. The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

Aaron Shourie, Chairman
José Toscano, Deputy Chairman
Michelle Bryan, General Counsel, Chief
Administrative Officer, and Secretary
Mirjana Hervy, Director, Finance

Board of Managers:

Aaron Shourie
José Toscano
Michelle Bryan

The business address of all Intelsat License LLC officers and members of the Board of Managers is: 7900 Tysons One Place, McLean, Virginia 22102.

Intelsat License LLC is a Delaware limited liability company that is indirectly wholly owned by Intelsat S.A. (formerly named Intelsat Emergence S.A.). Specifically, Intelsat License LLC is wholly owned by Intelsat License Holdings LLC, a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Ventures S.à r.l., a Luxembourg company, which is in turn wholly owned by Intelsat Alliance LP, a Delaware limited partnership. Intelsat Alliance LP is managed by one general partner (Intelsat Genesis GP LLC, a Delaware limited liability company) and two limited partners (Intelsat Genesis Inc., a Delaware corporation, and Intelsat Jackson Holdings S.A., a Luxembourg company). Intelsat Genesis GP LLC is wholly owned by Intelsat Genesis Inc., which is wholly owned by Intelsat Jackson Holdings S.A. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat Connect Finance S.à r.l., a Luxembourg company, which in turn is wholly owned by Intelsat Envision Holdings LLC, a Delaware limited liability company. Intelsat Envision Holdings LLC is wholly owned by Intelsat (Luxembourg) S.à r.l., a Luxembourg company. Intelsat (Luxembourg) S.à r.l. is wholly owned by Intelsat Investments S.à r.l., a Luxembourg company, which in turn is wholly owned by Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4, rue Albert Borschette, L-1246 Luxembourg.

Pacific Investment Management Company LLC (“PIMCO”), a Delaware limited liability company, serves as the manager or investment advisor for a number of investment funds and other investment vehicles that each hold less than 10% of the voting and non-voting equity interests in Intelsat S.A. However, to the best of Intelsat’s knowledge, as of April 7, 2023, the aggregate total of the voting and non-voting equity interests in Intelsat S.A. held by PIMCO-managed funds and certain parent entities of PIMCO exceeded 10%. Details regarding PIMCO are listed below.

PIMCO

Name: Pacific Investment Management Company LLC
Address: 650 Newport Center Drive, Newport Beach, CA
92660
Citizenship: United States (Delaware)
Indirect Voting Interest: Approximately 32.89%
Indirect Non-Voting Interest: Approximately 32.89%

A complete list of the investment funds and entities collectively controlling a 10% or greater indirect voting and indirect non-voting interest in Intelsat S.A. is set forth in Intelsat's 2022 application for consent to the assignment and transfer of control of authorizations.¹

¹ See Application for Assignment and Transfer of Control of Authorizations held by Intelsat License LLC, as debtor-in-possession, IBFS File No. SAT-ASG-20210826-00117 (filed Aug. 26, 2021).