

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Intelsat License LLC

Amendment to Pending Application to
Modify Authorization for Galaxy 28
(S2160)

ICFS File No.

SAT-AMD-_____
SAT-MOD-20250327-00083

**APPLICATION OF INTELSAT LICENSE LLC
TO AMEND PENDING APPLICATION FOR GALAXY 28**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.117 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ hereby amends the above-captioned pending application² seeking to modify the authorization for Galaxy 28 (S2160).³

The pending Application sought to (1) relocate the satellite from 89.0° W.L. to 88.7° W.L.; (2) extend Galaxy 28’s license term, and through July 29, 2030, to better align with the satellite’s updated estimated end of service life; and (3) waive 47 C.F.R. § 25.114(d)(14)(ii) to allow for processing of the Galaxy 28 application without requiring Intelsat to supplement the previously approved orbital debris mitigation plan with a Debris Assessment Software (“DAS”) analysis due to the satellite’s age.

¹ 47 C.F.R. § 25.117.

² See Application of Intelsat License LLC to Modify Authorization for Galaxy 28, ICFS File No. SAT-MOD-20250327-00083 (filed Mar. 27, 2025) (“Application”).

³ Galaxy 28 was formerly known as Intelsat Americas 8 (IA-8) and Telstar 8. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC, Notification of New Space Station Names (filed Jan. 8, 2007).

This Amendment: (a) replaces the request to operate Galaxy 28 at 88.7° W.L. with a request to operate Galaxy 28 at 27.1° W.L., where the satellite is currently operating pursuant to STA,⁴ and provides updated technical information in a revised Schedule S and Engineering Statement; and (b) adds a request for waiver of 47 C.F.R. § 25.120(j) in order to operate Galaxy 28 with an east-west station-keeping box ± 0.1 degrees.⁵ Intelsat retains the request for waiver of 47 C.F.R. § 25.114(d)(14)(ii) and extension of Galaxy 28's license terms contained in the Application and incorporates those requests by reference.⁶

All other information provided in the Application remains unchanged and is incorporated by reference.⁷ Additionally, Intelsat will continue to operate Galaxy 28 in accordance with the Commission's *C-band Order* and Footnotes NG182 and NG457A of the U.S. Table of Frequency Allocations.⁸

I. REQUEST TO OPERATE GALAXY 28 AT 27.1° W.L WITH A ± 0.1 DEGREES STATION-KEEPING BOX.

Intelsat requests authority to permanently operate the Galaxy 28 satellite at the 27.1° W.L. orbital location within a ± 0.1 degrees station-keeping box. Intelsat requests authority to utilize the following frequencies at the 27.1° W.L. location:

⁴ See *Intelsat License LLC, Request for 30-day STA for Galaxy 28 (S2160)*, ICFS File No. SAT-STA-20260212-00087, Stamp Grant (granted Feb. 18, 2026).

⁵ 47 C.F.R. § 25.210(j).

⁶ See Application, Legal Narrative at 4-8.

⁷ See *id.*, Legal Narrative; Engineering Statement.

⁸ Intelsat has sought reconsideration to allow its continued access to 500 MHz at its consolidated international TT&C/gateway sites on a protected basis to ensure C-band service continuity to customers on its international C-band satellites. See *Intelsat License LLC, Petition for Reconsideration*, GN Docket No. 18-122 (filed May 26, 2020).

Frequencies:⁹	3.7-4.2 GHz (space-to-Earth) ¹⁰ 11.7-12.2 GHz (space-to-Earth) 5.925-6.425 GHz (Earth-to-space) 14.0-14.5 GHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) center frequencies: 4195.0 MHz and 4199.5 MHz (space-to-Earth) 5926.5 MHz and 6423.5 MHz (Earth-to-space)
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II. WAIVER REQUEST FOR RELAXED STATIONKEEPING.

In addition to the waiver of the Commission’s DAS requirement requested in the Application,¹¹ Intelsat requests waiver of Section 25.210(j) of the Commission’s rules¹² to operate Galaxy 28 with an East/West station-keeping tolerance of +/- 0.1° (a “0.1° station-keeping box”) instead of +/- 0.05°.

Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”¹³ Good cause exists if “special circumstances warrant a deviation

⁹ Intelsat is not seeking authority to operate the Galaxy 28 satellite’s Ka-band payload, which was previously licensed by Viasat, and acknowledges that any future operation of the satellite’s Ka-band payload will require a new grant of authority. *See* Letter from Jarrett S. Taubman, VP & Deputy Chief Gov’t. Affairs and Regulatory Officer, Viasat, Inc., to Ms. Marlene H. Dortch, Sec’y, FCC, ICFS File No. SAT-MOD-20191126-00141 (Mar. 12, 2025) (surrendering Viasat’s Galaxy 28 Ka-band license).

¹⁰ Intelsat will continue to operate Galaxy 28 in accordance with the Commission’s *C-band Order* and Footnote NG182 of the U.S. Table of Frequency Allocations. *See Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, FCC 20-22 (2020).

¹¹ Application, Legal Narrative at 4-6.

¹² 47 C.F.R. § 25.210(j) (requiring GSO satellites to be maintained within 0.05° of their assigned orbital longitude in the east/west direction, unless specifically authorized by the Commission to operate with a different longitudinal tolerance).

¹³ *Id.* § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

from the general rule and such deviation will serve the public interest” better than adherence to the general rule.”¹⁴ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”¹⁵ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive the $\pm 0.05^\circ$ East/West station-keeping requirement and authorize Galaxy 28 to instead operate within a 0.1° station-keeping box. The Commission has previously waived this rule based on a finding that allowing an increased station keeping volume would “not adversely affect the operations of other spacecraft, and would conserve fuel for future operations.”¹⁶

The present request falls squarely within the Commission’s precedents. Increasing the satellite’s East/West tolerance would conserve fuel because the need for eccentricity maneuvers would be significantly reduced. The resulting fuel savings will maximize the use of the satellite and promote the continued efficient use of orbital resources. In addition, allowing a 0.1°

¹⁴ *N.E. Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁵ *WAIT Radio*, 418 F.2d at 1159.

¹⁶ See, e.g., *Application of Intelsat License LLC to Modify Authorization for Intelsat 902 (S2406)*, ICFS File No. SAT-MOD-20240430-00091, Stamp Grant ¶ 19 (granted June 26, 2024) (waiving Section 25.210(j) of the Commission’s rules); *Petition of Intelsat License LLC for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List for Ku- and S-band Operations at 143° W.L.*, ICFS File No. SAT-PDR-20191205-00143, Stamp Grant ¶ 19 (granted Apr. 29, 2020) (waiving same because “operating HISPASAT 143W-1 at a $\pm 0.1^\circ$ station-keeping tolerance will have no adverse impact on other operators” and “will also allow Intelsat to conserve fuel and extend the life of HISPASAT 143W-1”); *Application of SES Americom, Inc. for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, ¶¶ 10-14 (2005) (agreeing with SES “that increasing the station-keeping volume of the Satcom SN4 spacecraft will not adversely affect the operations of other spacecraft, and would conserve fuel for future operations”).

station-keeping box would not adversely affect the operation of other spacecraft. A list of known operational satellites within $\pm 6^\circ$ of the 27.1° W.L. orbital location is provided in the table below:

Satellite Name	Orbital Location	Operator
SES-4	22.0° W.L.	New Skies Satellites B.V.
N/A	24.0° W.L.	Federal Government (Reserved)
Galaxy 28	27.1° W.L.	Intelsat
Hispasat 30W-5	30.0° W.L.	Hispasat
N/A	30.0° W.L.	Federal Government (Reserved)
N/A	30.4° W.L.	Federal Government (Reserved)
Intelsat 25	31.5° W.L.	Intelsat

Operating Galaxy 28 with a 0.1° station-keeping box will have a negligible impact on the interference environment for adjacent satellites. Intelsat's proposed operations will not cause any more interference or require any more interference protection than a satellite operating within a 0.05° station-keeping box, and will in any event conform with all applicable coordination agreements and the Commission's rules governing operations vis-à-vis adjacent locations.¹⁷

Further, Intelsat's operation of Galaxy 28 with a 0.1° station-keeping box will not affect the station-keeping of any other spacecraft. As shown in the above table, the minimum orbital separation between Galaxy 28 and the nearest satellites not operated by Intelsat or an SES-affiliated company—Hispasat 30W-6 and a federal government satellite—is 2.9° . For this reason, increasing Galaxy 28's station-keeping box to 0.1° will not affect the station-keeping of any other operational satellite because, even assuming a 0.1° station-keeping box for nearby satellites, there will be no overlapping station-keeping tolerances with any other satellite.

¹⁷ See 47 C.F.R. §§ 25.140(a)(3)(i)-(iv) (setting forth power limits on uplink and downlink transmissions to ensure compatibility of GSO FSS space stations at two-degree spacing intervals).

Additionally, Intelsat is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Galaxy 28 at 27.1° W.L. Further, Intelsat is not aware of any system with an overlapping station-keeping volume with Galaxy 28 that is the subject of an International Telecommunication Union filing and that is either in orbit or progressing towards launch.

III. PUBLIC INTEREST SHOWING

Grant of the Application for Galaxy 28, as amended, is in the public interest because it will allow Intelsat to meet customer demand from the 27.1° W.L. orbital location, and permit the more efficient utilization of the satellite by operating with a 0.1° station-keeping box.

Finally, grant of this modification request will not result in an increased risk of harmful interference. At the 27.1° W.L. orbital location, Intelsat will operate Galaxy 28's communications payloads and TT&C frequencies in conformance with existing coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

IV. CONCLUSION

For the reasons set forth above, Intelsat respectfully requests that the Commission grant the Application, as amended herein.

Respectfully submitted,

Jennifer D. Hindin
WILEY REIN LLP
2050 M Street, NW
Washington, DC 20036

/s/ Daniel C.H. Mah
Daniel C.H. Mah
Vice President, Legal & Regulatory Affairs
SES Americom, Inc.

on behalf of Intelsat License LLC

March 16, 2026

Exhibit A

FCC Form 312, Response to Question 34: Foreign Ownership

Intelsat License LLC (“Intelsat”) is a Delaware limited liability companies that is indirectly wholly owned by SES S.A. The Commission most recently approved foreign ownership in Intelsat License LLC (“Intelsat”) in the *SES-Intelsat Order*, wherein the Space Bureau authorized the transfer of control of Intelsat.¹ There have been no material changes to Intelsat’s ownership since the *SES-Intelsat Order*.

¹ See *Intelsat S.A. (Transferor) and SES S.A. (Transferee)*, Memorandum Order and Opinion, SB Docket No. 24-267, DA-25-614, ICFS File Nos. SAT-T/C-20240530-00116, SAT-T/C-20240530-00117, SAT-MPL20240809-00176, SAT-MPL-2024080900177, SAT-MPL-20240809-00179, SEST/C-20240530-01222, SES-T/C-2024060301221 (rel. Jul. 11, 2025) (“*SES-Intelsat Order*”).

Exhibit B

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

The officers of Intelsat License LLC are as follows:

Aaron Shourie, Chairman
Nancy Eskenazi, Deputy Chairman
Diane Watkinson, VP, Tax
Stephanie Finn, Secretary
Mirjana Hervy, Director, Finance

The business address of all Intelsat License LLC officers is 7900 Tysons One Place, McLean, Virginia 22102.

Intelsat License LLC is a Delaware limited liability company that is indirectly wholly owned by SES S.A. Specifically, Intelsat License LLC is wholly owned by Intelsat License Holdings LLC, also 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 and two limited partners—Intelsat Genesis GP LLC, Intelsat Genesis Inc., and Intelsat Jackson Holdings S.à r.l., respectively. Intelsat Genesis GP LLC is a Delaware limited liability company, which is wholly owned by Intelsat Genesis Inc., a Delaware corporation.

Intelsat Genesis Inc. is a wholly owned subsidiary of Intelsat Jackson Holdings S.à r.l., a Luxembourg company. Intelsat Jackson Holdings S.à r.l. is wholly owned Intelsat Holdings S.à r.l., a Luxembourg company. Intelsat Holdings S.à r.l. is wholly owned by SES S.A., a Luxembourg company. Each of these entities may be contacted at the following address: Château de Betzdorf, L-6815 Betzdorf, Grand Duchy of Luxembourg.

The names, addresses, and citizenship of stockholders owning of record and/or voting 10 percent or more of SES S.A. voting stock as of July 22, 2025, are:

The **Etat du Grand Duché de Luxembourg** (the “State of Luxembourg”) – and **Banque et Caisse d’Epargne de l’Etat** (“BCEE”) and **Société Nationale de Crédit et d’Investissement** (“SNCI”), each of which is a financial institution 100% owned by the State of Luxembourg, hold Class B shares of SES S.A. representing a combined effective economic interest of 16.67% and effective voting interest of 33.33%. In addition, SES S.A. understands that the State of Luxembourg, BCEE, and SNCI hold a limited number of publicly traded Fiduciary Deposit Receipts (“FDRs”). According to publicly available information as of January 6, 2025, the State of Luxembourg held FDRs representing an economic interest of 1.36% and voting interest of 1.09%. According to SNCI’s 2024 Annual Report, it held FDRs representing an ownership interest of 1.59% as of December 31, 2024. According to the BCEE Annual Report from 2024, BCEE held FDRs representing a 0.92% ownership interest. SES S.A. does not know how many FDRs these

entities may have acquired or disposed of since those dates, as they are entitled to buy and sell FDRs without notice to SES S.A. The principal business of both BCEE and SNCI is financial services.

The address for the State of Luxembourg is Ministry of State, Department of Media, Connectivity, and Digital Policy, 5, rue Plaetis, L-2338 Luxembourg.

The addresses of BCEE and SNCI are as follows:

Banque et Caisse d'Epargne de
l'Etat 1, place de Metz
L-1930 Luxembourg

Société Nationale de Crédit et
d'Investissement 7, rue du Saint-Esprit
L-1475 Luxembourg

Atlas Infrastructure Partners (UK) Ltd ("Atlas") holds a 13.5% economic interest and a 10.9% voting interest in SES S.A. Atlas, a U.K. company, is an investment fund and has the below address:

Atlas Infrastructure Partners (UK) Ltd
3rd Floor, 25 Watling St.,
London EC4M 9BR, United Kingdom

The Lazard Entities: Lazard Asset Management, LLC, a U.S. investment advisor and hedge fund, and Lazard Asset Management Pacific Company, an Australian investment advisor and wholly owned subsidiary of Lazard Asset Management, LLC, combined hold a 13.4% economic interest and a 10.8% voting interest in SES S.A. The addresses of the Lazard Entities are as follows:

Lazard Asset Management, LLC
30 Rockefeller Plaza
New York, NY 10112

Lazard Asset Management Pacific Company
Level 12 Gateway
1 Macquarie Place
Sydney, NSW, 2000