** Re-issued on 12/17/10 to include two further conditions **

GRANTED*
International Bureau
*with conditions

File # SAT-LOA-20100726-00167

Call Sign S2814 Grant Date 11/17/10

(or other identifier)

From see conditions Term Dates To: see conditions

Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060–0678

Date & Time Filed: Jul 26 2010 10:48:25:176AM
File Number: SAT–LOA–20100726–00167
Callsign/Satellite ID: S2814

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Application to Launch and Operate Intelsat 17, a Replacement Satellite, at 66.0 E.L.

1–8. Legal Name of Applicant

Name:	Intelsat North America LLC	Phone Number:	202–944–7848
DBA Name:		Fax Number:	202–944–7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E–Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 –3006
Attention:	Susan H. Crandall		

Attachment to Grant
Intelsat North America LLC
IBFS File No. SAT-LOA-20100726-00167
Call Sign S2814

The application of Intelsat North America LLC (Intelsat) for authority to construct, launch and operate a C-/Ku-band geostationary orbit space station, to be known at Intelsat 17, at the 66° E.L. orbital location IS GRANTED. Accordingly, Intelsat is authorized to operate the Intelsat 17 space station at 66° E.L. to provide fixed-satellite service in the 3625-4200 MHz (space -to-Earth), 5850-6425 MHz (Earth-to-space), 10.95-11.20 GHz (space -to-Earth), 11.45-11.70 GHz (space -to-Earth), 12.50-12.75 GHz (space -to-Earth), 13.75-14.5 GHz (Earth-to-space) frequency bands. Intelsat is also authorized to conduct telemetry, tracking, and telecommand (TT&C) operations using frequencies centered on 3947.5 MHz and 3952.5 MHz (space-to-Earth) and 6173.7 MHz and 6176.3 MHz (Earth-to-space) necessary to maintain Intelsat 17 at the 66° E.L. orbital location. This authorization is granted in accordance with the terms, conditions, and technical specifications set forth in Intelsat's application, the Commission's rules not waived herein, and is subject to the following conditions:

1. Intelsat shall prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat shall be held responsible for all cost-recovery fees associated with ITU filings. We also note that no protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. *See* 47 C.F.R. § 25.111(b).

2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.

3. While at the 66° E.L. orbital location, Intelsat must maintain the Intelsat 17 space station with an east/west longitudinal station-keeping tolerance of +/-0.05 degrees.

4. Intelsat's request for waiver of Section 25.114(d) (3) of the Commission's rules, 47 C.F.R. § 25.114(d)(3), is granted. Section 25.114(d) (3) requires that the space station antenna gain contour(s) for each transmit and receive antenna beam should be plotted on an area map at 2 dB intervals down to 10 dB below peak value of the parameter, and at 5 dB intervals between 10 dB and 20 dB below peak values. Intelsat requests a waiver of Section 25.114(d)(3) with respect to Intelsat 17's Landmass and Europe-Middle East beam cross-polarization diagrams, wide-beam and medium beam antenna gain diagrams, and C-band and Ku-band ULPC antenna gain diagrams. Intelsat states that the satellite manufacturer did not provide these beam patterns in the form required by 25.114(d)(3). In lieu of the format required by 25.114(d)(3), Intelsat has submitted descriptions of the relevant beam patterns in addition to beam information provided by the satellite manufacturer. We have reviewed the antenna beam descriptions that Intelsat provided in Exhibits 5A through 5T to support the 25.114(d)(3) informational requirement and find that the descriptive characterizations of the antenna beam patterns in combination with the manufacturer's beam patterns provide by Intelsat are sufficient to fulfill the informational requirements of Section 25.114(d)(3).

5. Intelsat's request for a waiver of 25.202(g) of the Commission's rules, 47 C.F.R. 25.202(g) is granted. Intelsat requests a waiver of Section 25.202(g) of the Commission's rules to allow it to conduct telecommand functions for the Intelsat 17 space station in the 6173.7 and 6176.3 MHz frequencies and telemetry on the 3947.5 MHz and 3952.5 MHz frequencies. Section 25.202(g) limits space

station operators to TT&C links in the same frequency bands as their primary service operations. The purpose of this rule is to simplify the coordination process among space stations at adjacent orbit locations, to provide an incentive for a space station operator to maximize the efficiency of its system's TT&C operations, and to minimize the constraints placed on other space station operations. Intelsat maintains that the specific hardware and telemetry channels were chosen for Intelsat17 so as to minimize any corresponding impact on Intelsat's ground control stations. Intelsat also states that it will be operating from an orbital location that does not have a view of the United States, where TT&C frequencies of adjacent satellite may or may not be located at the edge of the operating band. This waiver grant is based upon the following findings:

a. Placement of TT&C in the center of the standard C-band has already been coordinated for the existing satellite at this orbital location, and, therefore, operation of the new satellite would not negatively alter the potential impact on adjacent satellites or require additional coordination;

b. Altering current coordination arrangements for this and adjacent locations would be unduly disruptive of ongoing operations;

c. The Intelsat-17 space station will operate with lower uplink TT&C power than Intelsat 702, thus resulting in reduced interference potential; and

d. Intelsat does not plan to operate this space station in the future at a location capable of serving the contiguous United States (CONUS).

As a condition of granting this waiver, Intelsat must accommodate future space station networks that are compliant with Section 25.202(g). Further, Intelsat must operate Intelsat-17 pursuant to any existing or future coordination agreements for this location.

6. Intelsat's request for waiver of Section 25.210(i)(l) of the Commission's rules, 47 C.F.R. 25.210(i)(l), is granted. Section 25.210(i)(l) requires space station antennas to be designed to provide a cross-polarization isolation such that the ratio of the on axis co-polar gain to the cross-polar gain of the antenna in the assigned frequency band is at least 30 dB within its primary coverage area. Intelsat indicates that the cross-polarization isolation ratio for Intelsat 17 C-band receive antenna is at least 28.5 dB in its primary coverage area, except Southern Africa and a small area in Europe, where it is greater than 22 dB, as well as in small sections of Asia where the cross-polarization isolation ratio ranges from 22 to 28.5dB (see Exhibits 5BB-1 through 5BB-6 to its application). Intelsat states that although part of its coverage area – Intelsat 17's Landmass and Europe Middle East receive transmit beams – do not meet the requirements of 25.210(i)(l), its failure to meet the requirements will not adversely affect any other operator in this instance. We agree that waiver in this instance will not produce a significant increase in interference, except to the applicant itself. As a condition of the waiver, Intelsat shall claim no more protection from interference from other licensed radiocommunication systems operating in accordance with the Commission's rules than if its antennas met Section 25.210(i) of the rules.

7. Intelsat's use of the 3625-3650 MHz (space-to-Earth) band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 3600-3650 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.

8. Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106 NG185, which states that the 3650-3700 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems

9. Intelsat's use of the 5850-5925 MHz band (Earth-to-space) is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. §2.106, US245, which states that the 5850-5925 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat shall not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.

10. Intelsat North America's use of the 10.95-11.2 GHz and the 11.45-11.7 GHz frequency bands is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

11. The operation of the Intelsat 17 space station in the 11.45-11.7 GHz band is limited to international operations in accordance with footnote NG104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106 NG104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

12. Use of the 12.50-12.75 GHz frequency band is not permitted for fixed-satellite service in the space-to-Earth direction in Region 2.

13. Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, any earth station in the United States and its possessions (US&P) communicating with the Intelsat 17 space station in the 13.75-14.0 GHz frequency band (Earth-to-space) is required to coordinate through National Telecommunications and Information Administration's (NTIA's) Interdepartment Radio Advisory Committee's (IRAC's) Frequency Assignment Subcommittee (FAS).[1]

14. Operations of any earth station in the US&P communicating with the Intelsat 17 space station in the 13.75-14.0 GHz frequency band (Earth-to-space) shall comply with footnote US356 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, which specifies a minimum antenna diameter of 4.5 meters and a minimum equivalent isotropically radiated power (e.i.r.p.).[2] Operations of any earth station located outside the US&P communicating with the Intelsat 15 space station in the 13.75-14.0 GHz frequency band (Earth-to-space) shall be consistent with footnote 5.502 to the ITU Radio

[1] Footnote US337 requires that earth stations operating in the 13.75-13.8 GHz frequency band shall be coordinated through NTIA's IRAC's FAS to minimize interference to the forward space-to-space link of the National Aeronautics and Space Administration Tracking and Data Relay Satellite System. 47 C.F.R. § 2.106, US337.

[2] Footnote US356 places a restriction on a minimum antenna diameter of 4.5 meters and the e.i.r.p. that should be on FSS operations in order to protect government operations in the band, including manned space flight. 47 C.F.R. § 2.106, US356.

Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network.[3]

15. Operators of earth stations accessing the Intelsat 17 space station in the 13.75-14.0 GHz frequency band are encouraged to cooperate voluntarily with the National Aeronautics and Space Administration (NASA) in order to facilitate continued operation of NASA's Tropical Rainfall Measuring Mission (TRMM) satellite.[4]

16. In the 13.75-14.0 GHz band, receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.

17. Intelsat's operation of Intelsat 17 at the 66° E.L. orbital location in the 3700-4200 MHz (space -to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.20 GHz (space -to-Earth), 11.45-11.70 GHz (space -to-Earth), 12.50-12.75 GHz (space -to-Earth), and 14.0-14.5 GHz (Earth-to-space) is subject to the following conditions:

    a. Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (ITSO) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.

    b. No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.

18. With respect to the 3625-3700 (space-to-Earth), 5850-5925 MHz (Earth-to-space), and 13.75-14.00 GHz (Earth-to-space) frequency bands, Intelsat submitted evidence that it had met the first three milestones required for a geostationary satellite pursuant to Section 25.164 of our rules, 47 C.F.R. § 25.164, and requested that the bond requirement pursuant to Section 25.165, 47 C.F.R. § 25.165, of our rules be reduced accordingly. Intelsat supplemented that information on November 1, 2010.[5]

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[3] Footnote 5.502 to the ITU Radio Regulations establishes minimum antenna diameters for earth stations of geostationary and non-geostationary satellite networks, and places certain restrictions on either the minimum e.i.r.p. or the power flux density (p.f.d.) levels produced by earth stations operating in the 13.75-14.0 GHz frequency band.

[4] NASA's TRMM satellite system radar in the 13.793-13.805 GHz frequency band remains operational and is a highly valuable and visible United States asset with a broad range of international users. Accordingly, NTIA has requested cooperation from the Commission and non-Federal Government entities in providing assistance in reducing interference with the TRMM radar. Specifically, NTIA requests that FSS earth stations in the 13.793 - 13.805 GHz frequency band located south of 39° N. and east of 110° W. operate with emission levels below –150 dBW/600 kHz at the TRMM space station receiver. Letter from Frederick R. Wentland, Acting Associate Administrator, Office of Spectrum Management, NTIA, to Don Abelson, Chief, International Bureau, FCC (February 28, 2002). Considering the secondary nature of the TRMM operation, NTIA's request is not a condition of this authorization. The Commission, however, urges all operators of earth stations accessing the Intelsat-15 space station in the 13.75 - 14.0 GHz frequency band to cooperate voluntarily with NASA in order to facilitate continued operation of the TRMM satellite.

[5] Letter from Jennifer D. Hindin, Counsel to Intelsat North America LLC, to Marlene H. Dortch, FCC, dated Nov. 1, 2010 (informing that Intelsat 17 had arrived at the launch facility in Kourou, French Guiana, on October 26, 2010, where it is scheduled for a November 2010 launch).

Based on the evidence provided, the Satellite Division finds that Intelsat has satisfied the first three milestones (execute a binding non-contingent contract for construction, complete the critical design review, and commence construction) required for a geostationary satellite. The milestone and bond requirements are adjusted accordingly.

a. Intelsat's space station at the 66° E.L. orbital location must be launched and placed into operation in accordance with the technical parameters and terms and conditions of this authorization within two years following the date of this authorization (November 17, 2012); and

b. Intelsat must file a bond with the Commission in the amount of $750,000, pursuant to the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003), within 30 days of the date of this grant (December 17, 2010).

Failure to meet either of these dates shall render this authorization to operate in the 3625-3700 (space-to-Earth), 5850-5925 MHz (Earth-to-space), and 13.75-14.00 GHz (Earth-to-space) frequency bands null and void.

19. The Intelsat 17 space station must begin providing service at the 66° E.L. orbital location in the 3700-4200 MHz (space -to-Earth), 5925-6425 MHz (Earth-to-space), 10.95-11.20 GHz (space -to-Earth), 11.45-11.70 GHz (space -to-Earth), 12.50-12.75 GHz (space -to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands before the space station it is replacing, Intelsat 702 (Call Sign S2388), discontinues service at the 66° E.L. orbital location. Failure to meet this milestone shall render this authorization to operate in these frequency bands NULL and VOID.

20. The license term for the space station is 15 years and will begin on the date that Intelsat certifies to the Commission that the satellite has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Intelsat is directed to file its certification of commencement of operation with the Commission within five business days of the satellite being placed into operation at the 66° E.L. orbital location.

21. Intelsat is afforded 30 days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

22. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 of the Commission's rules or applications for reconsideration under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106,1.115, may be filed within 30 days of the public notice indicating that this action was taken.

<u>Conditions added on December 17, 2010 (see Letter from Robert G. Nelson to Susan H. Crandall, dated December 17, 2010):</u>

23. The EIRP density from the Intelsat 17 space station in the downlink frequency band of 3700-4200 MHz shall not exceed the lesser of the values provided either in Intelsat's application or in Sections 25.212(d)(1) and (d)(2) of the Commission's rules, and the uplink power spectral density in the frequency band of 5925-6425 MHz shall not exceed the lesser of the values provided either in

Intelsat's application or in Sections 25.212(d)(1) and (d)(2) of the Commission's rules. Operations with powers exceeding these levels require separate specific Commission authorization.

24. The EIRP density from the Intelsat 17 space station in the downlink frequency bands of 10.95-11.20 GHz, 11.45-11.7 GHz, and 12.50-12.75 GHz shall not exceed the lesser of the values provided either in Intelsat's application or in Section 25.212(c) of the Commission's rules, and the uplink power spectral density in the frequency band of 14.0-14.5 GHz shall not exceed the lesser of the values provided either in Intelsat's application or in Section 25.212(c) of the Commission's rules. Operations with powers exceeding these levels require separate specific Commission authorization.

** Re-issued on 12/17/10 to include two further conditions **

FEDERAL COMMUNICATIONS COMMISSION

GRANTED*
International Bureau

*with conditions

File # SAT-LOA-20100726-00167

Call Sign S2814 Grant Date 11/17/10

(or other identifier)

From see conditions Term Dates To: see conditions

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

9–16. Name of Contact Representative

Name:	Jennifer D. Hindin	Phone Number:	202–719–4975
Company:	Wiley Rein LLP	Fax Number:	202–719––7049
Street:	1776 K Street, NW	E–Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 –
Attention:	Jennifer D. Hindin	Relationship:	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the buttonnext to the classification that applies to thisfiling for both questions a. and b. Choose only one for 17a and only one for 17b.

a.

(N/A) a1. Earth Station

◉ a2. Space Station

b.

○ b1. Application for License of New Station

(N/A) b2. Application for Registration of New Domestic Receive–Only Station

(N/A) b3. Amendment to a Pending Application

(N/A) b4. Modification of License or Registration

(N/A) b5. Assignment of License or Registration

(N/A) b6. Transfer of Control of License or Registration

(N/A) b7. Notification of Minor Modification

(N/A) b8. Application for License of New Receive–Only Station Using Non–U.S. Licensed Satellite

○ b9. Letter of Intent to Use Non–U.S. Licensed Satellite to Provide Service in the United States

○ b10. Replacement Satellite Application – no new frequency bands

◉ b11. Replacement Satellite Application – new frequency bands (Not eligible for streamlined processing)

○ b12. Petition for Declaratory Ruling to be Added to the Permitted List

(N/A) b13. Other (Please specify)

17c. Is a fee submitted with this application?

◉ If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).

○ Governmental Entity ○ Noncommercial educational licensee

○ Other(please explain):

17c. Fee Classification BNY – Space Station (Geostationary)

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:
Not Applicable

19. If this filing is an amendment to a pending application enter:

(a) Date pending application was filed:

Not Applicable

(b) File number of pending application:

Not Applicable

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- [x] a. Fixed Satellite
- [ ] b. Mobile Satellite
- [ ] c. Radiodetermination Satellite
- [ ] d. Earth Exploration Satellite
- [ ] e. Direct to Home Fixed Satellite
- [ ] f. Digital Audio Radio Service
- [ ] g. Other (please specify)

21. STATUS: Choose thebutton next to the applicable status. Choose only one.	22. If earth station applicant, check all that apply.
○ Common Carrier ◉ Non−Common Carrier	Not Applicable

23. If applicant is providng INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one.Are these facilities:

○ Connected to a Public Switched Network ○ Not connected to a Public Switched Network ◉ N/A

24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).

- [x] a. C−Band (4/6 GHz)
- [x] b. Ku−Band (12/14 GHz)
- [ ] c.Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

(N/A) a. Fixed Earth Station
(N/A) b. Temporary–Fixed Earth Station
(N/A) c. 12/14 GHz VSAT Network
(N/A) d. Mobile Earth Station
◉ e. Geostationary Space Station.
○ f. Non–Geostationary Space Station
○ g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Not Applicable

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.) Not Applicable

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

○ Yes ◉ No
Engineering Statemen

ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	○ Yes ◉ No
30. Is the applicant an alien or the representative of an alien?	○ Yes ◉ No ○ N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	○ Yes ◉ No ○ N/A
32. Is the applicant a corporation of which more than one–fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	○ Yes ◉ No ○ N/A
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one–fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	◉ Yes ○ No ○ N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.	◉ Yes ○ No
36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explination of circumstances.	◉ Yes ○ No Certification
37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explination of circumstances.	○ Yes ◉ No SSL Letter
38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attemptiing unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances	○ Yes ◉ No Picture 1
39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhinit, an explanation of the circumstances.	○ Yes ◉ No Picture 2

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.	
41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	(●) Yes ( ) No
42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.	( ) Yes (●) No
42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?	

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat North America LLC, pursuant to Section 25.114 of the rules of the Federal Communications Commission, hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Intelsat 17, at the 66.0 E.L. orbital location. Intelsat 17 is scheduled for launch on an Ariane 5 vehicle in the fourth quarter of 2010 or first quarter

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specifiedin 47 C.F.R. Part 25. (●) A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements. ( ) B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached. ( ) C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- ○ Individual
- ○ Unincorporated Association
- ○ Partnership
- ○ Corporation
- ○ Governmental Entity
- ◉ Other (please specify) Limited Liability Company

45. Name of Person Signing	46. Title of Person Signing
Susan H. Crandall	Asst. General Counsel, Intelsat Corporation

47. Please supply any need attachments.

1: Legal Narrative 2: 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Completed Schedule S

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

43. Description. (Summarize the nature of the application and the services to be provided).

Intelsat North America LLC, pursuant to Section 25.114 of the rules of the Federal Communications Commission, hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Intelsat 17, at the 66.0 E.L. orbital location. Intelsat 17 is scheduled for launch on an Ariane 5 vehicle in the fourth quarter of 2010 or first quarter of 2011 timeframe and will replace the Intelsat 702 satellite (call sign S2388), which is currently operating at 66.0 E.L.