

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	IB Docket No. 06-137
	)	File No. SAT-MSC-20060710-00076
Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended	)	Call Signs S2400, S2394, S2389, S2396, S2397, S2410, S2406, S2408, S2402, S2414, S2405, S2399, S2409, S2411, S2391, S2407, S2395, S2398, S2404

**ORDER OF MODIFICATION**

**Adopted: February 21, 2008**

**Released: February 21, 2008**

By the Chief, International Bureau:

**I. INTRODUCTION**

1. In this Order of Modification, we modify, pursuant to section 316(a) of the Communications Act, as amended (“the Act”), certain space station licenses held by Intelsat North America LLC (“Intelsat North America”). The modifications add to Intelsat North America’s space station licenses certain conditions requested by the U.S. Department of State (“State Department”), in consultation with the National Telecommunications and Information Administration (“NTIA”), to promote fulfillment of U.S. obligations under an international agreement and of U.S. foreign policy objectives.

**II. BACKGROUND**

2. This proceeding began on July 18, 2006 when the International Bureau (“Bureau”) released a Public Notice seeking comment on a Petition filed by the International Telecommunications Satellite Organization (“ITSO”).<sup>1</sup> The Petition asked the Commission to impose three conditions on licenses for

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<sup>1</sup> Petition of the International Telecommunications Satellite Organization (ITSO), IB Docket No. 06-137 (filed July 10, 2006) (“Petition”); *Petition of the International Telecommunications Satellite Organization Under Section 316 of the Act*, IB Docket No. 06-137 and File No. SAT-MSC-20060710-00076, Public Notice, DA 06-1460, 21 FCC Rcd 7923 (Int’l Bur. 2006) (“Public Notice”) (accepting the Petition as an informal pleading under 47 C.F.R. § 1.41 and seeking comment on the Petition). ITSO had raised similar issues in an earlier proceeding involving the transfer of control of licenses held by two subsidiaries of PanAmSat to Intelsat Holdings Ltd. (“Intelsat”), the indirect parent of Intelsat North America. In that proceeding dealing with the transfer of the PanAmSat authorizations, the Commission declined to adopt the relief ITSO sought with respect to Intelsat’s space station licenses. The Commission explained, however, that it could consider a separate request by ITSO under section 316 of the Act, if advised by the State Department that such action would promote provisions of the relevant international agreement and U.S. fulfillment of obligations under that agreement. *Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee* (continued....)

certain Intelsat North America space stations and associated orbital locations and radio frequencies transferred in 2001 from INTELSAT, the intergovernmental organization, to Intelsat North America's parent Intelsat LLC, a U.S. entity created by INTELSAT for the purpose of owning and operating INTELSAT's C- and Ku-band FSS satellites upon privatization.<sup>2</sup> Intelsat LLC subsequently assigned its authorizations to Intelsat North America, its wholly-owned U.S. subsidiary.<sup>3</sup> Intelsat North America is a Fixed-Satellite Service ("FSS") operator that, along with other companies in the Intelsat organizational structure, owns and operates components of Intelsat's global satellite system providing FSS capacity to a variety of users. ITSO is the residual, post-privatization intergovernmental organization, governed by international agreement ("ITSO Agreement"), that oversees the Intelsat public service obligations established as part of the 2001 privatization.<sup>4</sup> The United States is a party to the ITSO Agreement, with the State Department serving as the U.S. representative.<sup>5</sup>

3. Intelsat North America initially opposed the conditions requested by ITSO.<sup>6</sup> On March 15, 2007, the State Department, after consultations with NTIA, filed a letter ("State Letter") recommending that the Commission impose two of the three conditions proposed by ITSO.<sup>7</sup> On October 19, 2007,

(Continued from previous page) \_\_\_\_\_

*Corp. and PanAmSat H-2 Licensee Corp.*, IB Docket No. 05-290, Memorandum Opinion and Order, FCC 06-85, 21 FCC Rcd 7368, 7402 ¶ 65 (2006) ("*Intelsat-PanAmSat Order*").

<sup>2</sup> In 2001, when the parties to INTELSAT – the intergovernmental organization created by international treaty in 1973 to operate a global commercial telecommunications system – privatized INTELSAT, INTELSAT transferred its C- and Ku-band space stations to Intelsat LLC, a U.S. entity. *See generally Applications of Intelsat LLC for Authority to Operate, and to Further Construct, Launch and Operate, C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, Memorandum Opinion Order and Authorization, FCC 00-287, 15 FCC Rcd 15460, 15517-20, ¶¶ 149-173 (2000) ("*Intelsat Licensing Order*"), *recon. denied*, 15 FCC Rcd 25234 (2000) (authorizing Intelsat LLC to operate 17 C- and Ku-band satellites then owned and operated by INTELSAT, to construct, launch and operate ten satellites planned by INTELSAT for operation in these bands, and to relocate certain satellites upon the launch of the ten planned satellites, with the authorizations to become effective upon the date in which INTELSAT transferred its satellites to Intelsat LLC and its International Telecommunication Union ("ITU") network filings to the United States). Appendix A of this Order of Modification lists the authorizations and orbital locations subject to the *Intelsat Licensing Order*.

<sup>3</sup> *Policy Branch Information, Actions Taken*, Public Notice, File Nos. SAT-ASG-20050418-00084 and SAT-ASG-20050418-00085, Report No. SAT-00294, 20 FCC Rcd 9959 (PB/SD/Int'l Bur. 2005).

<sup>4</sup> *See Agreement Relating to the International Telecommunications Satellite Organization (ITSO Agreement)* (Nov. 17, 2000), Art. III(a) ("... the main purpose of ITSO is to ensure, through the Public Services Agreement, that the Company provides, on a commercial basis, international public telecommunications services, in order to ensure performance of the Core Principles."), *available at* <http://www.itso.int>.

<sup>5</sup> *See Intelsat-PanAmSat Order*, 21 FCC Rcd at 7395, ¶ 53.

<sup>6</sup> Opposition of Intelsat, IB Docket No. 06-137 and File No. SAT-MS-20060710-00076 (filed Aug. 17, 2006). ITSO responded to Intelsat's opposition. Reply Comments of the International Telecommunications Satellite Organization (ITSO), IB Docket No. 06-137 and File No. SAT-MS-20060710-00076 (filed Aug. 28, 2006). Intelsat replied to ITSO's response. Reply of Intelsat, IB Docket No. 06-137 and File No. SAT-MS-20060710-00076 (filed Sept. 5, 2006).

<sup>7</sup> Letter from Ambassador David A. Gross, United States Coordinator, International Communications and Information Policy, U.S. Department of State, to The Honorable Kevin J. Martin, Chairman, Federal Communications Commission, IB Docket No. 06-137 (dated Mar. 15, 2007) at 1, 3-4 (recommending conditions (continued....))

Intelsat North America and ITSO filed a joint letter in which Intelsat North America withdrew its opposition, ITSO withdrew its request for the third condition, and both entities requested the Commission to condition the licenses with the two conditions recommended by the State Letter.<sup>8</sup> On November 23, 2007, the Bureau issued an *Order Proposing Modification*.<sup>9</sup> On December 21, 2007, Intelsat North America sought an extension of time until January 10, 2008 to respond to the *Order Proposing Modification*.<sup>10</sup> On December 26, 2007, the Policy Division, International Bureau, Federal Communication Commission granted the extension by grant stamp. On January 10, 2008, Intelsat North America, while stating that it does not object to the proposed conditions in principle, filed a Limited Protest to Seek Clarification as to the circumstances in which the conditions would apply.<sup>11</sup> On February 1, 2008, the State Department sent a letter to the Chief, International Bureau, Federal Communications Commission, stating its view that the filings by ITSO, Intelsat and the State Department now represent a fully consistent record and that the proceeding is ripe for action by the Commission, and asking for expeditious action to impose the agreed conditions and close the proceeding.<sup>12</sup>

### III. DISCUSSION

4. Section 316 of the Act grants the Commission authority to modify licenses if, in the judgment of the Commission, such action will promote the public interest, convenience, and necessity or will result in fuller compliance with the provisions of the Act or of any treaty ratified by the United States.<sup>13</sup> Section 1.87 of the Commission's rules implements section 316.<sup>14</sup> Section 316 and its (Continued from previous page) \_\_\_\_\_

that (1) explicitly obligate Intelsat to remain a signatory to the Public Services Agreement between Intelsat and ITSO approved by the ITSO Twenty-fifth Assembly of Parties and (2) provide, for licensing purposes, that no entity can be considered a successor-in-interest to Intelsat under the ITSO Agreement unless the entity has undertaken to perform the obligations of the Public Services Agreement).

<sup>8</sup> Letter to The Honorable Kevin J. Martin, Chairman, Federal Communications Commission, from Ahmed Toumi, Director General & Chief Executive Officer, ITSO and Phillip L. Spector, Secretary, Intelsat North America L.L.C., IB Docket No. 06-137 (filed Oct. 19, 2007) ("Joint ITSO-Intelsat Letter") at 1-2.

<sup>9</sup> *Petition of the International Telecommunications Satellite Organization under Section 316 of the Communications Act, as Amended*, IB Docket No. 06-137, Order Proposing Modification, DA 07-4715, 22 FCC Rcd 20093 (Int'l Bur. 2007) ("*Order Proposing Modification*").

<sup>10</sup> Intelsat North America Motion for Extension of Time, IB Docket No. 06-137 (filed Dec. 21, 2007).

<sup>11</sup> Intelsat North America Limited Protest to Seek Clarification, IB Docket No. 06-137 (filed Jan. 10, 2008) at 1-2.

<sup>12</sup> Letter to Helen Domenici, Chief, International Bureau, Federal Communications Commission, from Steven W. Lett, Deputy United States Coordinator, International Communications and Information Policy, U.S. Department of State, IB Docket No. 06-137 (filed Feb. 1, 2008).

<sup>13</sup> 47 U.S.C. § 316(a)(1). *See also California Metro Mobile Communications, Inc. v. FCC*, 365 F.3d 38, 45 (D.C. Cir. 2004) ("*California Metro*") (stating "Section 316 grants the Commission broad power to modify licenses; the Commission need only find that the proposed modification serves the public interest, convenience and necessity."); *Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems*, ET Docket No. 00-258, Eighth Report and Order, Fifth Notice of Proposed Rulemaking and Order, FCC 05-172, 20 FCC Rcd 15866, 15877, ¶ 19 (2005) (citing *California Metro*).

<sup>14</sup> 47 C.F.R. § 1.87.

implementing rule provide Intelsat North America with the opportunity to object to the proposed modifications.<sup>15</sup> The *Order Proposing Modification* afforded Intelsat North America the opportunity to protest the proposed modifications as applied to any of the relevant satellites, orbital locations, and associated frequencies.<sup>16</sup>

5. Based on the record in this proceeding, and pursuant to section 316(a) of the Act and section 1.87 of the rules, we adopt the modifications proposed in the *Order Proposing Modification*. Thus, we modify the relevant Intelsat North America space station licenses to include the conditions recommended by the State Letter and acceptable to ITSO and Intelsat.<sup>17</sup> As discussed below, in response to Intelsat's Limited Protest to Seek Clarification, we remove call signs S2388 and S2401 from the caption and the ordering clauses and clarify the circumstances under which the conditions would apply.<sup>18</sup> Because the license modifications proposed by the State Letter would result in fuller compliance with the provisions of an international agreement to which the United States is a party and fulfillment of U.S. foreign policy objectives, we find that such modifications will serve the public interest, convenience, and necessity.<sup>19</sup>

6. The State Letter asserts that it is appropriate to satisfy the first of the ITSO requests by explicitly obligating Intelsat, as a condition for holding the subject licenses, to remain a signatory to the Public Services Agreement between Intelsat and ITSO that was approved by the ITSO Twenty-fifth Assembly of Parties.<sup>20</sup> The State Letter also asserts that the Commission should respond to ITSO's second request by conditioning the subject Intelsat licenses to provide that, for licensing purposes, no entity can be considered a successor-in-interest to Intelsat under the ITSO Agreement unless the entity has undertaken to perform the obligations of the Public Services Agreement.<sup>21</sup>

7. As stated in the *Order Proposing Modification*, we proposed to adopt these two license modifications after considering the foreign policy interests raised by the State Letter.<sup>22</sup> The *Order*

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<sup>15</sup> 47 U.S.C. § 316(a)(1); 47 C.F.R. § 1.87(a).

<sup>16</sup> *Order Proposing Modification*, 22 FCC Rcd at 20102, ¶ 13.

<sup>17</sup> See State Letter and Joint ITSO-Intelsat Letter, *supra*.

<sup>18</sup> See *infra* ¶¶ 10-12.

<sup>19</sup> See 47 U.S.C. § 316(a)(1) (Commission may modify license if, in the Commission's judgment, such action will promote the public interest, convenience, and necessity or result in fuller compliance with provisions of the Act or any treaty ratified by United States).

<sup>20</sup> State Letter at 3.

<sup>21</sup> State Letter at 4. The State Letter observes that the ITSO Agreement expressly defines the privatized successor to INTELSAT as including the privatized company's successors-in-interest. State Letter at 4; ITSO Agreement, Art. I(d). The State Letter notes that, under the ITSO Agreement, it is the express obligation of the privatized entity, Intelsat, and of Intelsat's successors-in-interest, "to ensure performance of the Core Principles." State Letter at 4, citing ITSO Agreement, Art III(a).

<sup>22</sup> We also adopt an administrative condition requiring Intelsat North America, in filing any application seeking Commission approval to modify, assign, transfer or otherwise take action with respect to the relevant space station authorizations, to cite to this Order of Modification in the narrative section of the relevant application. See *infra* ¶ 13.

*Proposing Modification* gave deference to the Executive Branch on its interpretation of the foreign policy benefits of modifying the relevant licenses to promote the provisions of an international agreement to which the United States is a party.<sup>23</sup> The State Letter asserts that the advancement of U.S. foreign policy interests will be achieved by adhering to the commitments made in the process of INTELSAT's privatization.<sup>24</sup> In referring to these commitments, the State Letter references Article XII(c) of the ITSO Agreement, which states that a party selected to act as Intelsat's Notifying Administration shall "authorize the use of [the relevant orbital slots and frequency assignments] by [Intelsat] so that the Core Principles [of global connectivity and coverage, lifeline connectivity, and non-discriminatory access] may be fulfilled" and "in the event that such use is no longer authorized, or [Intelsat] no longer requires such frequency assignments(s), cancel such frequency assignment under the procedures of the ITU."<sup>25</sup> The State Letter advises that the two proposed conditions will further ensure adherence to these commitments.<sup>26</sup> We are required, pursuant to section 316, to decide whether such conditions will promote the public interest, convenience, and necessity or result in fuller compliance with the provisions of the Act or of any treaty ratified by the United States.<sup>27</sup> In this case, based on the foreign policy analysis done by the State Department, we find that these conditions will promote the public interest, convenience and necessity by providing fuller compliance with the provisions of the ITSO Agreement to which the United States is a party.

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<sup>23</sup> *Order Proposing Modification*, 22 FCC Rcd at 20101, ¶ 10.

<sup>24</sup> State Letter at 5. Commitments made towards INTELSAT's privatization had statutory support. Section 644(b) of Public Law 106-180, the Open-Market Reorganization for the Betterment of International Telecommunications Act (the ORBIT Act), 47 U.S.C. § 765c(b), which sought to ensure a pro-competitive privatization of INTELSAT, expressed the intent of Congress that "The President and the Commission shall take the action necessary to ensure that the United States remains the [International Telecommunication Union] notifying administration for the privatized INTELSAT's existing and future orbital slot registrations."

<sup>25</sup> State Letter at 2; ITSO Agreement, Art. XII(c).

<sup>26</sup> *See, e.g.*, State Letter at 1 (advising that adoption of the two proposed conditions will promote the provisions of the ITSO Agreement, fulfillment of U.S. obligations under the ITSO Agreement, and fulfillment of U.S. foreign policy objectives). The State Letter states that the Commission satisfied the first Art. XII(c) obligation in 2000 by licensing the orbital locations and associated frequencies to Intelsat LLC. State Letter at 2. However, it further states that, in light of the clear expectation that the orbital locations/frequency assignments would be licensed so that Intelsat could fulfill the "core principles," it is appropriate to grant the ITSO Director General's first request by explicitly requiring Intelsat, as a condition for holding the subject licenses, to remain a signatory of the Public Services Agreement. *Id.* at 3. It also advises that, because the contingency of a possible Intelsat bankruptcy was not fully anticipated prior to INTELSAT's privatization, that contingency now should be addressed by adding the proposed condition requiring any successor-in-interest to Intelsat to be a signatory of the Public Services Agreement, to ensure continuing compliance with the core principles even after any potential bankruptcy. State Letter at 4. The State Letter observes that there has been no occasion to invoke the second Art. XII(c) obligation. *Id.* at 2. We note that an existing condition applicable to the relevant licenses provides the basis for meeting the second Art. XII(c) obligation, should the occasion arise. *See Intelsat Licensing Order*, 15 FCC Rcd at 15519, ¶ 159 (ordering cancellation of orbital locations and associated frequencies in the event they no longer are assigned for use by Intelsat LLC or its successors).

<sup>27</sup> 47 U.S.C. § 316(a)(1).

8. The State Letter recommends imposing the two conditions on the Intelsat North America licenses for "... the orbital locations and associated radio frequency assignments transferred to the United States Notifying Administration..."<sup>28</sup> We observe that four orbital locations licensed in 2000 currently are unused. They are 178 E.L., 177 E.L., 176 E.L., and 330.5 E.L. (29.5 W.L.). Should Intelsat file an application to license a space station at any of these locations, we would apply the conditions to any grant of such application.

9. As stated in the *Order Proposing Modification*, these conditions do not change any other existing condition on the Intelsat North America licenses.<sup>29</sup> The conditions are not intended to serve as an enforcement mechanism for the Public Services Agreement between ITSO and Intelsat or in any way to modify the contractual relationship between Intelsat and ITSO.<sup>30</sup> Rather, consistent with the foreign policy reasons detailed in the State Letter, the conditions are intended to ensure compliance with the ITSO Agreement to which the United States is a party.

10. Finally, in its Limited Protest to Seek Clarification, Intelsat North America seeks to assure that the conditions would apply to current and future space station authorizations to use the specific orbital locations and frequencies transferred to Intelsat upon privatization. In its pleading, Intelsat North America asked the Commission to:

amend paragraph 14 of the proposed ordering clauses to remove any reference to individual satellites, as signified by individual call signs, and instead make clear that the proposed conditions apply to all authorizations for present or future operations using the specific orbital locations (listed in Appendix A to the Commission's decision) and associated frequencies that were transferred to the United States at privatization, regardless of the particular physical satellite that makes use of those frequencies at the transferred location. If references to call signs are retained, the Commission should eliminate call signs S2388 and S2401, which are for satellites not located in the relevant orbital locations listed in Appendix A. Further, for administrative ease, these conditions should automatically attach to a satellite license when the satellite is located in one of the specified orbital locations and using the frequencies transferred at privatization and should automatically be removed from the license if the satellite is re-located to an orbital location not specified in Appendix A.<sup>31</sup>

11. It is our intention that the conditions would apply to current and future space station authorizations to use the specific orbital locations and frequencies transferred to Intelsat upon privatization. We agree with Intelsat North America that deleting the two call signs from the ordering

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<sup>28</sup> State Letter at 5.

<sup>29</sup> See, e.g., *Intelsat Licensing Order*, 15 FCC Rcd at 15517-20, ¶¶ 148-173 (ordering clauses); *Intelsat LLC ORBIT Act Compliance Order*, 16 FCC Rcd 12280, 12303-04, ¶¶ 73-81 (2001) (ordering clauses).

<sup>30</sup> See, e.g., *Intelsat-PanAmSat Order*, 21 FCC Rcd at 7401, ¶ 64 ("any consideration of the type of relief ITSO seeks (that is, to condition existing Intelsat licenses) should be focused on the Intelsat satellites operating in orbital locations defined by the ITSO Agreement as part of the INTELSAT 'common heritage' and used by Intelsat to implement the Public Services Agreement and fulfill Intelsat's obligations under the ITSO Agreement.")

<sup>31</sup> Limited Protest to Seek Clarification at 2-3.

clauses will be more consistent with the State Letter, which urges that we impose the relevant conditions on the FCC licenses “for the orbital locations and associated radio frequency assignments transferred to the United States Notifying Administration pursuant to the decisions of the Twenty-fifth [ITSO] Assembly of Parties.”<sup>32</sup> Thus, we delete S2388 and S2401 from the caption and ordering clauses of this Order of Modification. As we routinely administer licenses through space station call signs, we decline to adopt the procedures Intelsat requests and retain specific call signs in paragraph 13, below. Moreover, as we explain more fully below, we believe that routine procedures will address Intelsat’s concerns. Additionally, as stated above, should Intelsat file an application to license a space station at 178 E.L., 177 E.L., 176 E.L., and 330.5 E.L. (29.5 W.L.), we would apply the conditions to any grant of such application.<sup>33</sup>

12. Intelsat North America also asks, for administrative purposes, that the conditions automatically attach or remove from a satellite license when the satellite moves into or out of a transferred orbital location. Our routine procedures involve the filing of an application and an appropriate entry into Commission databases in connection with the modification of the orbital location at which a space station operates, or the authorization of a replacement satellite. Thus, as part of routine processing, we will add conditions in authorizations in connection with authority to launch into or operate a satellite at one of the transferred orbital locations, and remove conditions in connection with authority to operate at other orbital locations. Similarly, as part of routine processing of an application to move a satellite out of a transferred orbital location, we would remove any conditions from the authorization that are not appropriate for the new orbital location. In this regard, paragraph 13 of this Order of Modification includes a condition that requires Intelsat, when filing a relevant application, to cite to this Order of Modification in the narrative section of the relevant application.

#### IV. ORDERING CLAUSES

13. Accordingly, IT IS ORDERED that, pursuant to sections 4(i) and 316(a) of the Communications Act, 47 U.S.C. §§ 154(i), 316(a), and section 1.87 of the Commission’s rules, 47 C.F.R. § 1.87, each of Intelsat North America’s space station authorizations, call signs S2400, S2394, S2389, S2396, S2397, S2410, S2406, S2408, S2402, S2414, S2405, S2399, S2409, S2411, S2391, S2407, S2395, S2398, and S2404, SHALL BE MODIFIED by adding the following conditions:

IT IS ORDERED that 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;

IT IS FURTHER ORDERED that 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.

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<sup>32</sup> State Letter at 5.

<sup>33</sup> See *supra* ¶ 8.

IT IS FURTHER ORDERED that Intelsat, in filing any application seeking Commission approval to modify, assign, transfer or otherwise take action with respect to this authorization, SHALL CITE TO the Order of Modification, DA 08-444, in the narrative section of the relevant application.

14. IT IS FURTHER ORDERED that a copy of this Order of Modification SHALL BE SENT BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED, to:

Intelsat North America LLC  
c/o Kalpak Gude  
Vice President & Deputy General Counsel  
Susan H. Crandall  
Assistant General Counsel  
Intelsat Corporation  
3400 International Drive, N.W.  
Washington, D.C. 20008

with a copy to each of the following:

Phillip Spector  
Executive Vice President and  
General Counsel  
Intelsat Holdings, Ltd.  
Wellesley House North, 2<sup>nd</sup> Floor  
90 Pitts Bay Road  
Pembroke, HM 08, Bermuda

and

Bert W. Rein  
Carl R. Frank  
Counsel to Intelsat North America LLC  
Wiley Rein LLP  
1776 K Street, N.W.  
Washington, D.C. 20006.

15. This action is taken under delegated authority pursuant to sections 0.51 and 0.261 of the Commission's rules, 47 C.F.R. §§ 0.51, 0.261.

FEDERAL COMMUNICATIONS COMMISSION

Helen Domenici, Chief  
International Bureau



**Appendix A**  
**Authorizations and Orbital Locations Subject to the 2000 *Intelsat Licensing Order***

Satellite (Call Sign) <sup>34</sup>	Orbital Location
IS-701 (S2400)	180° E.L.
-	178° E.L.
-	177° E.L.
-	176° E.L.
IS-605 (S2394)	174° E.L.
IS-602 (S2389)	157° E.L.
IS-709 (S2396) <sup>35</sup>	85° E.L.
IS-704 (S2397)	66° E.L.
IS-906 (S2410) <sup>36</sup>	64° E.L.
IS-902 (S2406)	62° E.L.
IS-904 (S2408)	60° E.L.
IS-702 (S2388) <sup>37</sup>	-
IS-706 (S2401) <sup>38</sup>	-
IS-802 (S2402) <sup>39</sup>	33° E.L.
IS-10-02 (S2414)	359° E.L. (1° W.L.)
IS-901 (S2405)	342° E.L. (18° W.L.)
IS-603 (S2399) <sup>40</sup>	340° E.L. (20° W.L.)
IS-905 (S2409)	335.5° E.L. (24.5° W.L.)
IS-907 (S2411)	332.5° E.L. (27.5° W.L.)
-	330.5° E.L. (29.5° W.L.)
IS-801 (S2391)	328.5° E.L. (31.5° W.L.)
IS-903 (S2407)	325.5° E.L. (34.5° W.L.)
IS-705 (S2395)	310° E.L. (50° W.L.)
IS-707 (S2398)	307° E.L. (53° W.L.)
IS-805 (S2404)	304.5° E.L. (55.5° W.L.)

<sup>34</sup> Two satellites subject to the *Intelsat Licensing Order* no longer operate under Commission authority: (1) IS-804 transferred to Intelsat LLC in 2000, but subsequently experienced an in-orbit anomaly and is no longer operating; and (2) the authorization for IS-601 was terminated effective Nov. 3, 2007. See *Intelsat North America LLC, Application for Special Temporary Authority Concerning the Relocation of Intelsat 601 to the 47.5° W.L. Orbital Location*, Order, File No. SAT-STA-20061102-00128, DA 07-4482, 22 FCC Rcd 9258 (SD/Int'l Bur. 2007).

<sup>35</sup> IS-709 is authorized to operate at 85.15° E.L.

<sup>36</sup> IS-906 is authorized to operate at 64.15° E.L.

<sup>37</sup> IS-702 currently is located at 54.85 E.L., which is not one of the twenty-three orbital locations authorized in 2000.

<sup>38</sup> IS-706 currently is located at 50.25 E.L., which is not one of the twenty-three orbital locations authorized in 2000.

<sup>39</sup> IS-802 is authorized to operate at 32.9° E.L.

<sup>40</sup> IS-603 is authorized to operate at 19.95° W.L.