

September 19, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Supplement to Request for Special Temporary Authority for Castle Rock, Colorado Earth Station, Call Sign KL92; File No. SES-STA-20140917-00736

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein supplements its above referenced request for Special Temporary Authority (“STA”) to provide launch and early orbit phase (“LEOP”) services for Intelsat 30; provide telemetry, tracking, and control (“TT&C”) services for Intelsat 30 at the in-orbit testing (“IOT”) location, 132.0° W.L.; and to drift the satellite from the IOT location to Intelsat 30’s final location at 95.05° W.L. Specifically, Intelsat is seeking a waiver of the footnote NG52 to the U.S. Table of Frequency Allocation.

In order to perform LEOP services and TT&C during IOT and drift on the 11198.0 MHz, 11198.5 MHz, 11199.25 MHz, and 11199.75 MHz frequencies, Intelsat requests a waiver of the footnote NG52 to the U.S. Table of Frequency Allocations, which limits the use of the 10700-11700 MHz frequency band to “international systems.”<sup>1</sup> Intelsat seeks waiver to permit the Castle Rock, Colorado earth station, KL92, to communicate with the Intelsat 30 satellite for the limited purposes of LEOP services, TT&C services at 132.0° W.L., and to drift Intelsat 30 to its permanent location at 95.05° W.L.

The Commission may grant a waiver for good cause shown.<sup>2</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>3</sup> In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>4</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

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<sup>1</sup> See 47 C.F.R. § 2.106 fn. NG52.

<sup>2</sup> 47 C.F.R. §1.3.

<sup>3</sup> *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

<sup>4</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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Good cause exists here to grant a waiver allowing KL92 to provide LEOP services and TT&C during IOT and drift for Intelsat 30 in the 10700-11700 MHz band. LEOP, IOT, and the drift of the satellite will only be for a short duration. In addition, as explained in the STA request, the proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path, or are potentially affected by these operations at the IOT location. To Intelsat's knowledge, there are no co-frequency satellites within plus/minus six degrees of 132.0° W.L.

For the reasons set forth in its original STA request, Intelsat respectfully requests that the Commission grant the request.

Respectfully submitted,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais