

October 27, 2015

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

> Re: Request for Extension of Special Temporary Authority Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from November 2, 2015 through December 1, 2015—of the Special Temporary Authority("STA")¹ previously granted Intelsat to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase ("LEOP") services for the recently launched MexSat-G2 satellite.² This 30-day extension is requested in order to accommodate an extended LEOP mission.

The MexSat-G2 LEOP operations will continue to be performed using the following frequency bands: 13247.0 MHz and 12753.0 MHz (RHCP) in the uplink, and 11201.5 MHz and 11202.5 MHz in the downlink (LHCP & RHCP). Intelsat will continue to coordinate with all operators of satellites that use the same frequency bands and are in the LEOP path.³ All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the MexSat-G2 LEOP mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary) (310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

In further support of this extension request, Intelsat incorporates by reference Exhibits A and B submitted with its original STA request, which contain technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause

¹ Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² See Satellite Communications Services Information; Actions Taken, Report No. SES-01788, File No. SES-STA-20150921-00602 (Oct. 7, 2015) (Public Notice). The permanent orbital location for MexSat-G2, which Intelsat understands is licensed by Mexico, will be at 116.8° W.L. The in-orbit testing location will be 113.1° W.L.

³ Boeing, the manager of the MexSat-G2 LEOP mission, will handle the coordination.

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harmful interference into any lawfully operating terrestrial facility, as well as a waiver request. Intelsat also notes that for purposes of the MexSat-G2 LEOP mission, it will continue to operate in the frequencies listed in the request at power levels not to exceed 22 dBW. The technical information submitted with the original STA request reflects a power level as high as 29 dBW because Intelsat might operate at this level in the event an emergency necessitates the use of a higher power level in order to command the satellite. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Finally, Intelsat clarifies that during the MexSat-G2 LEOP mission, Boeing will continue to serve as the mission manager. Boeing will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to Boeing. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA extension request will allow Intelsat to help launch the MexSat-G2 satellite. This, in turn, will help will provide additional capacity at the 116.8° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA extension request to the undersigned at (703) 559-6949.

Respectfully submitted,

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Cynthia J. Grady Regulatory Counsel Intelsat Corporation

cc: Paul Blais