

December 7, 2015

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing January 14, 2016, to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase (“LEOP”) services for the SES-9 satellite. SES-9 is expected to be launched no earlier than January 14, 2016.<sup>2</sup> Intelsat expects the LEOP period to last between fourteen and eighty days.<sup>3</sup>

The SES-9 LEOP operations will be performed in the following frequency bands: 13753.0 MHz, 13998.0 MHz, and 14496.0 MHz in the uplink (RHCP), and 11199.5 MHz, 11702.5 MHz, and 12246.5 MHz in the downlink (RHCP). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.<sup>4</sup> 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 SES-9 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.

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<sup>1</sup> 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”).

<sup>2</sup> The permanent orbital location for SES-9, which Intelsat understands is licensed by Gibraltar, will be at 108.4° E.L. The in-orbit testing location will be 113.5° E.L.

<sup>3</sup> Intelsat is seeking 30 days to accommodate the LEOP window of the medium-lift launch, which will vary based on the performance of the rocket.

<sup>4</sup> Boeing, the manager of the SES-9 LEOP mission, will handle the coordination.

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In further support of this request, Intelsat hereby attaches Exhibits A, B, and C, which contain a 13.75 - 14.0 GHz analysis and waiver requests.

Finally, Intelsat clarifies that during the SES-9 LEOP mission, Boeing will 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 request will allow Intelsat to help launch the SES-9 satellite. This, in turn, will help will provide additional capacity at the 108.2° E.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais