

February 5, 2016

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 March 8, 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 Eutelsat-65W satellite. Eutelsat-65W is expected to be launched on March 8, 2016.<sup>2</sup> The LEOP period is expected to last approximately 10 days.<sup>3</sup>

The Eutelsat-65W LEOP operations will be performed in the following frequencies: 13752.0 MHz and 14000.0 MHz in the uplink (RHCP), and 10949.7 MHz and 11200.3 MHz in the downlink (LHCP). 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 Eutelsat-65W 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.

Intelsat hereby attaches Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, as well as a waiver request.

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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 Eutelsat-65W, which Intelsat understands is licensed by France, will be at 65.0° W.L. The in-orbit testing location will be 42.5° W.L.

<sup>3</sup> Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

<sup>4</sup> SSL, the manager of the Eutelsat-65W mission, will handle the coordination.

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Intelsat is in the process of coordination and will provide technical information that demonstrating that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility before launch. 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. Intelsat also notes that for purposes of the Eutelsat-65W LEOP mission, it is seeking to operate in the frequencies listed in this request at power levels not to exceed 21.0 dBW.

Finally, Intelsat clarifies that during the Eutelsat-65W launch, SSL will serve as the mission manager. SSL 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 SSL. 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 Eutelsat-65W satellite. This, in turn, will help provide video services at the 65.0° W.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