

March 8, 2016

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days, beginning March 15, 2016, of 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 SES-9 satellite.² SES-9 was launched on March 4, 2016.³ Intelsat expects the LEOP period to last between fourteen and eighty days.⁴

The SES-9 LEOP operations will continue to 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.⁵ 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)

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-01826, Fil No. SES-STA-20160203-00115 (Feb. 11, 2016) (Public Notice); *Satellite Communications Services information; Actions Taken*, Report No. SES-01813, File No. SES-STA-20151207-00916 (Jan. 13, 2016) (Public Notice);

³ 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.

⁴ 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.

⁵ Boeing, the manager of the SES-9 LEOP mission, will handle the coordination.

Ms. Marlene H. Dortch
March 8, 2016
Page 2

Request to speak with Harry Burnham or Kevin Bell.

In further support of this further extension request, Intelsat incorporates by reference Exhibits A - C submitted with its original request, which contain a 13.75 - 14.0 GHz analysis and waiver requests. Finally, Intelsat clarifies that during the SES-9 LEOP mission, Boeing will continue to serve as the mission manager. Boeing builds and sends the commands to the Intelsat antenna, which processes and executes the commands. Telemetry received by Intelsat is forwarded to Boeing. Intelsat performs 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 continue launching 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