

May 3, 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 May 28, 2016, to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase (“LEOP”) services for Intelsat 31; telemetry, tracking, and command (“TT&C”) during in-orbit testing (“IOT”) at 132.0° W.L; and TT&C during the drift of Intelsat 31 to and at its final location of 95.05° W.L.<sup>2</sup> Intelsat 31 is expected to be launched on May 28, 2016. The LEOP period is expected to last approximately 15 days; IOT and drift are expected to last approximately three and two weeks, respectively.

The proposed operations will be performed using the following frequencies: 13998.50 MHz, and 14006.0 MHz in the uplink (LHCP, H); and 11194.25 MHz, 11195.5 MHz, 11196.25 MHz, and 11196.75 MHz in the downlink (RHCP, V). The proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path, the drift path, or are potentially affected by these operations at the IOT location.<sup>3</sup> The proposed TT&C operations at 95.05° W.L. will be consistent with Intelsat’s coordination agreements for the nominal 95° W.L. location. All operators of potentially affected satellites 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 Intelsat 31 mission is as follows:

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

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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> See *Policy Branch Information; Actions Taken*, Report No. SAT-01052, File No. SAT-LOA-20140410-00038 (November 7, 2014) (Public Notice). At 95.05° W.L., Intelsat 31 will be co-located with Intelsat 30 (S2887) and Galaxy 3C (S2381).

<sup>3</sup> Intelsat will handle the coordination.

Ms. Marlene H. Dortch  
May 3, 2016  
Page 2

Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat hereby attaches Exhibit A, which contains 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, or into Federal systems operating in the 13.75 -14.00 GHz band. 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.

Grant of this STA request will allow Intelsat to help launch and test the Intelsat 31 satellite. This, in turn, will help ensure continuity of service at the 95.05° 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,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive style with a large initial 'C' and a long, sweeping underline.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais