

October 11, 2017

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 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 and telemetry, tracking, and command (“TT&C”) during in-orbit testing (“IOT”) at 176° E.L. for the Eutelsat 172B satellite.² Eutelsat 172B was launched on June 1, 2017.³ Intelsat expects the LEOP and IOT periods to last approximately 200 days.⁴

The Eutelsat 172B LEOP and TT&C operations will continue to be performed at the following frequencies: 13750.6 MHz, 13999.5 MHz, 14499.8 MHz, 13753.6 MHz, 14002.5 MHz, and 14496.8 MHz (CP) in the uplink; and 11200.6 MHz and 12250.1 MHz (CP) in the downlink. The LEOP operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁵ The TT&C operations at the IOT location will be coordinated with potentially affected adjacent operators. All operators potentially affected by either the drift or the TT&C operations at the IOT location 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 172B 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 \$200.00 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-01946, File No. SES-STA-20170213-00156 (Apr. 12, 2017) (Public Notice).

³ The in-orbit testing location for Eutelsat 172B, which Intelsat understands is licensed by France, will be at 176° E.L. The final location of Eutelsat 172B will be at 172° E.L.

⁴ Intelsat is seeking authority for an additional 30 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

⁵ Airbus, the manager of the Eutelsat 172B LEOP mission, will handle the coordination.

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Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat incorporates by reference Exhibits A and B, which contain a 13 GHz report and a waiver request. 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 Eutelsat 172B LEOP mission, Airbus will serve as the mission manager. Airbus 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 Airbus. 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 and safety station-keep the Eutelsat 172B satellite. This, in turn, will help provide additional capacity from the 172° E.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,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais