

October 16, 2017

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 180 days, commencing upon grant, to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 16 (S2750) on-station at 76.2° W.L.<sup>2</sup> Intelsat seeks this STA in order to assist a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico.

TT&C operations will be performed in the following frequencies: 12198.25 MHz, 12198.75 MHz, 13997.5 MHz, and 14499.5 MHz. Intelsat is concurrently filing a 30-day STA request for TT&C services during the drift of Intelsat 16 to, and for TT&C services at, 76.2° W.L. The proposed TT&C operations at 76.2° W.L. will be consistent with Intelsat’s coordination agreements for the nominal 76.2° W.L. orbital location. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

In further support of this request, Intelsat herewith 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 assist a customer in providing critical communication services in Puerto Rico. Accordingly, grant of this STA request is in the public interest.

---

<sup>1</sup> 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”).

<sup>2</sup> See *Intelsat License LLC Requests for 30-Day and 180-Day STAs to Drift and Operate Intelsat 16 at 76.2 W.L., Call Sign S2750*, File Nos. SAT-STA-20171016-00139 and SAT-STA-20171016-00140 (filed Oct. 16, 2017).

Ms. Marlene H. Dortch  
October 16, 2017  
Page 2

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais