

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
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 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) during its drift from 58.1° W.L to 76.2° W.L. and on-station at 76.2° W.L.² 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. The drift is expected to take two weeks.

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 180-day STA request for TT&C services at 76.2° W.L. The drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.³ 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 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.

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 *Intelsat License LLC Request for 30-Day STA to Drift and Operate Intelsat 16 at 76.2 W.L., Call Sign S2750*, File No. SAT-STA-20171016-00139 (filed Oct. 16, 2017).

³ Intelsat will handle the coordination.

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.

To the extent necessary, Intelsat requests a waiver of 47 C.F.R. § 25.120(a), which requires an STA request to be "received by the Commission at least 3 working days prior to the date of proposed ... operation[s.]" The Commission may grant a waiver for good cause shown.⁴ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive 47 C.F.R. § 25.120(a) because a natural disaster has decimated communications in Puerto Rico. In the weeks following Hurricane Maria, the island has been unable to overcome the damage caused to the communications networks and continues to desperately need basic communications. In order to reposition Intelsat 16 to 76.2° W.L. quickly, and given that the satellite drift will take two weeks, Intelsat seeks immediate authorization rather than filing a request 3 working days prior to the proposed drift and operations. Accordingly, "extraordinary reasons for the delay" justify waiver of the rule.

Grant of this STA request will allow Intelsat to expeditiously drift Intelsat 16 to a 76.2° W.L., where it will provide critical communication services in Puerto Rico. Accordingly, grant of this STA request is in the public interest.

⁴ 47 C.F.R. §1.3.

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

Ms. Marlene H. Dortch
October 16, 2017
Page 3

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this expedited 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