

Approved by OMB  
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
Request for 30-day STA Extension To Continue Using Castle Rock, Colorado Earth Station KL92 to Provide LEOP Services for the Azerspace-2 Satellite

**1. Applicant**


<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	c/o Intelsat US LLC 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall		

File # SES-STA-2018-10-11-03177

Call Sign KL92 Grant Date 12/4/2018  
(or other identifier)

Term Dates  
From 10/18/2018 To: 11/10/2018

Approved: [Signature]



**GRANTED**  
International Bureau

Extension of SES-STA-20180828-02516  
(Conditions of operations remain the same (NDB))

<b>2. Contact</b>	
<b>Name:</b> Cynthia J. Grady	<b>Phone Number:</b> 703-559-6949
<b>Company:</b> Intelsat US LLC	<b>Fax Number:</b> 703-559-8539
<b>Street:</b> 7900 Tysons One Place	<b>E-Mail:</b> cynthia.grady@intelsat.com
<b>City:</b> McLean	<b>State:</b> VA
<b>Country:</b> USA	<b>Zipcode:</b> 22102 -5972
<b>Attention:</b>	<b>Relationship:</b> Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number SESSTA2018082802526 or Submission ID	
4a. Is a fee submitted with this application? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station	
5. Type Request <input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other	
6. Requested Use Prior Date	
7. City Castle Rock	8. Latitude (dd mm ss.s h) 39 16 38.0 N

9. State	CO	10. Longitude (dd mm ss.s h)	104 48 26.9 W
11. Please supply any need attachments.		Attachment 1: STA Request	Attachment 2: Attachment 3:
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)			
<div style="border: 1px solid black; padding: 5px;"> <p data-bbox="518 481 662 929">Intelsat License LLC herein requests an additional 30 days of Special Temporary Authority previously granted Intelsat to continue using its Castle Rock, Colorado Ku-band earth station, call sign KL92, to provide launch and early orbit phase services for the Azerspace-2 satellite.</p> </div>			
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.			
Yes <input checked="" type="radio"/> No <input type="radio"/>			
14. Name of Person Signing		15. Title of Person Signing	
Cynthia J. Grady		Senior Counsel, Intelsat US LLC	
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).			

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**



**INTELSAT.**

Envision. Connect. Transform.

October 11, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 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”)<sup>1</sup> previously granted Intelsat to continue using its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase (“LEOP”) services for the Azerspace-2 satellite.<sup>2</sup> Azerspace-2 was launched on September 25, 2018.<sup>3</sup> Intelsat expects the LEOP period to last approximately 180 days and has a pending 180-day STA request for this antenna to accommodate the longer orbit-raising time period required for an electric propulsion satellite.<sup>4</sup>

The Azerspace-2 LEOP operations will continue to be performed at the following frequencies: 14497.50 MHz and 14499.5 MHz (CP) in the uplink; and 12745.0 MHz, 12745.5 MHz, 12748.25 MHz, and 12748.75 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.<sup>5</sup> 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 Azerspace-2 LEOP mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)

<sup>1</sup> Intelsat has filed its STA request, FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02096, File No. SES-STA-20180828-02516 (Sept. 12, 2018) (Public Notice).

<sup>3</sup> The in-orbit testing location for Azerspace-2, which Intelsat understands is licensed by Azerbaijan, will be 63.8° E.L. The final location of Azerspace-2 will be 45.0° E.L.

<sup>4</sup> See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02095, File No. SES-STA-20180828-02526 (Sept. 12, 2018) (Public Notice).

<sup>5</sup> SSL, the manager of the Azerspace-2 LEOP mission, will handle the coordination.

Intelsat US LLC

7900 Tysons One Place, McLean, VA 22102-5972 USA [www.intelsat.com](http://www.intelsat.com) T +1 703-559-6800

Ms. Marlene H. Dortch  
October 11, 2018  
Page 2

(310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

In further support of this extension request, Intelsat incorporates by reference Exhibit A, submitted with its original STA request,<sup>6</sup> which contains requests for waiver. 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 Azerspace-2 LEOP mission, SSL will continue to serve as the mission manager. SSL 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 SSL. Intelsat will continue to 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 continue helping with the launch of the Azerspace-2 satellite. This, in turn, will help provide additional capacity from the 45.0° 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  
Senior Counsel  
Intelsat US LLC

cc: Paul Blais

---

<sup>6</sup> See *supra* n. 2.