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October 23, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Further Extension of Special Temporary Authority
Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 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 telemetry, tracking, and command (“TT&C”) services² for Intelsat 16 (S2750) on-station at 76.2° W.L.³ Intelsat seeks this STA extension in order to continue assisting a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico while its application for authorization to operate this antenna on a permanent basis is pending before the Commission.⁴

TT&C operations will continue to be performed in the following frequencies: 12198.25 MHz, 12198.75 MHz, 13997.5 MHz, and 14499.5 MHz. The TT&C operations at 76.2° W.L. will continue to 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 incorporates by reference Exhibit A submitted with its original STA request, which contains technical information that demonstrates that the operation of the

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

² See, e.g. *Satellite Communications Services Information; Actions Taken*, Report No. SES-02093, File No. SES-STA-20180806-02094 (Sept. 5, 2018) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01334, File No. SAT-MOD-20180424-00029 (July 27, 2018) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01319, File No. SAT-STA-20180523-00043 (June 1, 2018) (Public Notice).

⁴ See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02097, File No. SES-MOD-20180611-01388 (Sept. 19, 2018) (Public Notice).

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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 further extension request will allow Intelsat to continue assisting a customer in providing critical communication services in Puerto Rico. Accordingly, grant of this STA further extension request is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA further extension request. Please direct any questions regarding this 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