

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

**APPLICANT INFORMATION** Enter a description of this application to identify it on the main menu:  
Request for an Additional 30 days of Special Temporary Authority to Use Castle Rock, Colorado Earth Station KL92 to Provide  
LEOP Services for JCSAT-18

**I. Applicant**

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

30 days "with conditions"

File # SES-STA-20200113-00082  
Call Sign KL92 Grant Date 02/28/2020  
(or other identifier)

Term Dates  
From: 02/28/2020 To: 03/28/2020

Approved: *[Signature]*



<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 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:
<p>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.)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat License LLC herein requests an additional 30 days of Special Temporary Authority previously granted to Intelsat to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase services for the JCSAT-18 satellite.</p> </div>	
<p>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"; party to the application; for these purposes.</p> <p style="text-align: right;">Yes <input checked="" type="radio"/> No <input type="radio"/></p>	
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Senior Counsel, Intelsat US LLC
<p>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).</p>	

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**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.**

Applicant: Intelsat License LLC  
Call Sign: KL92  
File No.: SES-STA-20200113-00082  
Special Temporary Authority ("STA")



File # SES-STA-20200113-00082

Call Sign KL92 Grant Date 02/28/2020  
(or other identifier)

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From: 02/28/2020 To: 03/28/2020

Approved: [Signature]

Intelsat License LLC is granted special temporary authority for 30 days, beginning February 28, 2020, to operate its Hagerstown, MD earth station to provide launch and early orbit phase ("LEOP") services for the JCSAT-18 satellite, licensed by Japan, on center frequencies: 13752.50 MHz and 14499.00 MHz ("RHCP") (Earth-to-space); and 12748.50 MHz and 12749.50 MHz ("RHCP") (space-to-Earth) under the following conditions. The in-orbit testing location for JCSAT-18 will be 148.0° E. and the satellite's final location will be 150.0° E. under the following conditions:

1. All operations shall be on an unprotected and non-harmful interference basis, Intelsat License LLC, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference and must inform the Commission, in writing, immediately of such an event.
2. Operations in the band 13.75-14 GHz, an earth station in the fixed-satellite service shall have a minimum antenna diameter of 4.5 m and the e.i.r.p. of any emission should be at least 68 dBW and should not exceed 85 dBW. In addition the e.i.r.p., averaged over one second, radiated by a station in the radiolocation service shall not exceed 59 dBW. Receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations, ITU Radio Regulation No. 5.43A does not apply. U5356.
3. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached when harmful interference occurs. Currently the 24x7 contact information for the drift mission 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.
4. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.
5. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.
6. Intelsat's operations during the period of January 16, 2020 to the date of this grant were authorized pursuant to Section 1.62 of the Commission's rules 47 C.F.R. § 1.62.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release. This special temporary authority was authorized pursuant to Section 1.62 of the Commission's rules, 47 C.F.R. § 1.62.



**INTELSAT.**

*Envision. Connect. Transform.*

January 10, 2020

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 to Intelsat<sup>2</sup> to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase (“LEOP”) services for the JCSAT-18 satellite, which was launched on December 16, 2019.<sup>3</sup> Intelsat expects to provide LEOP services to the satellite for approximately 45 days.

The LEOP operations will continue to be performed at the following frequencies: 12748.50 MHz and 12749.50 MHz (RHCP) in the downlink; and 13752.50 MHz and 14499.00 MHz (RHCP) in the uplink. 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>4</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 JCSAT-18 mission is as follows:

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<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.

<sup>2</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02227, File No. SES-STA-20191122-01552 (Dec. 18, 2019) (Public Notice).

<sup>3</sup> The in-orbit testing location for JCSAT-18, which Intelsat understands is licensed by Japan, will be 148.0° E.L. The satellite’s final location will be 150.0° E.L.

<sup>4</sup> Boeing, the manager of the JCSAT-18 mission, will handle the coordination.

Ms. Marlene H. Dortch  
January 10, 2020  
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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.

In further support of this request, Intelsat incorporates by reference Exhibits A-C of its original request,<sup>5</sup> which contain waiver requests and a 13.75 GHz – 14.0 GHz report. 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.

Intelsat clarifies that during the JCSAT-18 LEOP mission Boeing will serve as the mission manager. Boeing 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 Boeing. 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 the JCSAT-18 satellite and safely insert it into the geostationary arc. This will help provide services at the 150.0° E.L. location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this STA 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

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<sup>5</sup> See *supra* n. 2.