

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 the BB4A Satellite

1. Applicant

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

30 days "with conditions"

File # SES-STA-20200211-00156

Call Sign KL92 Grant Date 02/25/2020
(or other identifier)

Term Dates
From: 02/25/2020 To: 03/25/2020

Approved: [Signature]



GRANTED

International Bureau

2. Contact			
Name:	Cynthia J. Grady	Phone Number:	703-559-6949
Company:	Intelsat US LLC	Fax Number:	703-559-8539
Street:	7900 Tysons One Place	E-Mail:	cynthia.grady@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:		Relationship:	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?			
☒ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). ☐ Governmental Entity ☐ Noncommercial educational licensee ☐ Other (please explain):			
4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
☐ Use Prior to Grant ☐ Change Station Location ☒ Other			
6. Requested Use Prior Date			
7. City/Castle Rock		8. Latitude (dd mm ss.s h) 39 16 35.0 N	

9. State CO	10. Longitude (dd mm ss.s h) 104 48 23.0 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.)	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 to provide launch and early orbit phase services for the BB4A satellite.
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 ☒ No ☐
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing 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).	

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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-
File No.: SES-STA-20200211-00156
Call Sign: KL92
Special Temporary Authority



"with conditions"

File # SES-STA-20200211-00156

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Intelsat License LLC ("Intelsat") is granted a special temporary authority for 30 days, starting February 25, 2020, to operate its earth station in Castle Rock, Colorado to provide post-launch and early orbit phase ("LEOP") of operation, ranging, and electronic propulsion monitoring for the BB4A satellite launched January 16, 2020 using frequencies 14.0 GHz, 14.49980 GHz (Earth-to-space); and 11.70160 GHz, and 11.704 GHz and will be at the 14.0° E.L orbital location operating under the following conditions:

1. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis. Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
 2. In the event of any harmful interference under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
 3. All operators of satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs, Currently the 24x7 contact information for BB4A satellite is Ph.: (703) -559-7701 – East Coast Operations Center (primary) –(310) 525-5591- West Coast Operations Center (back-up)
 4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's risk.
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5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat applications.
 6. Intelsat's operations during the period of February 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 immediately.



INTELSAT.

Envision. Connect. Transform.

February 11, 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")¹ previously granted to Intelsat² to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase ("LEOP") services for the BB4A satellite, which was launched on January 16, 2020.³ Intelsat now expects to provide LEOP services to the satellite for a total of six months.

The LEOP operations will continue to be performed at the following frequencies: 11701.60 MHz (LHCP) and 11704.00 MHz (LHCP) in the downlink; and 14000.00 MHz (LHCP) and 14499.80 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.⁴ All operators of satellites in that path have been provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

¹ 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").

² See Intelsat License LLC Request for 30-day Grant of Special Temporary Authority to Use Castle Rock, Colorado Earth Station KL92 to Provide LEOP Services for the BB4A Satellite, File No. SES-STA-20200102-00058 (IBFS grant).

³ The in-orbit testing and final location for BB4A, which Intelsat understands is licensed by France, will be 14.0° E.L.

⁴ Thales Alenia Space ("Thales"), the manager of the BB4A mission, will handle the coordination.

The 24x7 contact information for the BB4A 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.

In further support of this request, Intelsat incorporates by reference Exhibit A of its original request⁵ which contains waiver requests. 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 BB4A LEOP mission Thales will continue to serve as the mission manager. Thales builds and sends the commands to the Intelsat antenna, which processes and executes the commands. Telemetry received by Intelsat is forwarded to Thales. Intelsat performs the ranging sessions by sending a tone to the spacecraft periodically. Intelsat remains in control of the baseband unit, RF equipment, and antenna.

Grant of this STA extension request will allow Intelsat to help launch the BB4A satellite and safely insert it into the geostationary arc. This will help provide services at the 14.0° 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

⁵ See *supra* n. 2.