November 18, 2020

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Special Temporary Authority
Castle Rock, Colorado Earth Station KL92
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an expedited grant of Special Temporary Authority ("STA")[1] for 10 days, beginning immediately, to use its Castle Rock, Colorado Ku-band earth station (KL92) to perform deorbit maneuvers for Telesat's MSAT-1 satellite.[2] The MSAT-1 deorbit is expected to utilize KL92 for no more than 10 days.

As Intelsat telephonically informed the International Bureau, toward the end of the deorbit of MSAT-1,Telesat determined that the satellite will not complete venting all its propellant before it drifts outside the range of Telesat's earth stations. Intelsat's Castle Rock, Colorado earth station will be utilized in order to allow Telesat to safely complete the venting and deorbit of MSAT-1.

The deorbit maneuvers will be performed at the following frequencies: 11701.0 MHz and 11702.75 MHz in the downlink; and 14499.5 MHz in the uplink. The proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the deorbit path. 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 MSAT-1 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.

[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.

[2] MSAT-1 is licensed by Canada and was granted U.S. market access via an earth station (E980179). *See* FCC Approved Space Station List at https://www.fcc.gov/approved-space-station-list.

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To the extent necessary, Intelsat requests a waiver of 47 C.F.R. § 25.120(a) of the Federal Communications Commission's ("Commission") rules, which requires an STA request to be received by the Commission at least three working days prior the start of proposed operations.[3]

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.[4] The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.[5] 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.[6] 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 here because Intelsat's earth station is needed immediately to ensure the safe deorbiting MSAT-1, which serves the public interest. Additionally, Intelsat did not have all the necessary information needed to seek STA prior to November 18, 2020, and therefore Intelsat is unable to comply with the requirements of § 25.120(a) and still meet Telesat's requirement to provide continuity of deorbit services for MSAT-1.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request. Please direct any questions regarding this expediated STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Karl Kensinger
Paul Blais

[3] 47 C.F.R. § 25.120(a).

[4] 47 C.F.R. § 1.3.

[5] *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

[6] *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.