

November 24, 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

Dear Ms. Dortch:

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Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, commencing December 16, 2020, to use its Castle Rock, Colorado Ku-band earth station (KL92) to provide launch and early orbit phase ("LEOP") services for the Turksat-5A satellite. Turksat-5A is expected to launch on December 16, 2020.² Intelsat expects the LEOP period to last approximately 120 days.

The Turksat-5A LEOP operations will be performed at the following frequencies: 14002.0 MHz, 14000.5 MHz, and 14499.0 MHz in the uplink, and 11698.6 MHz, 11669.4 MHz, and 10950.2 MHz in the downlink. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.³ 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 Turksat-5A LEOP 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 herewith attaches Exhibit A, 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.

² The in-orbit testing and final location for Turksat-5A, which Intelsat understands is licensed by the Republic of Turkey, will be 31.0° E.L.

³ Airbus, the manager of the Turksat-5A mission, will handle the coordination.

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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.

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Finally, Intelsat clarifies that during the Turksat-5A LEOP mission, Airbus will serve as the mission manager. Airbus 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 Airbus. 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 request will allow Intelsat to help launch the Turksat-5A satellite. This will help provide services at the 31.0° 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 request. Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

<u>/s/ Cynthia J. Grady</u> Cynthia J. Grady Assistant General Counsel Intelsat US LLC

cc: Paul Blais