



January 28, 2021

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

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

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“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 (KL92) to provide launch and early orbit phase (“LEOP”) services for the Turksat-5A satellite. Turksat-5A was launched on January 8, 2021,<sup>3</sup> and Intelsat expects the LEOP period to last approximately 120 days.

The Turksat-5A LEOP operations will continue to 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 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 have been 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.

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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-02333, File No. SES-STA-20201202-01286 (Jan. 13, 2021) (Public Notice).

<sup>3</sup> The in-orbit testing and final location for Turksat-5A, which Intelsat understands is licensed by Turkey, will be 31.0° E.L.

<sup>4</sup> Airbus, the manager of the Turksat-5A mission, will handle the coordination.

In further support of this request, Intelsat incorporates by reference Exhibit A of its original request,<sup>5</sup> 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.

Finally, Intelsat clarifies that during the Turksat-5A LEOP mission, Airbus will continue to 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 extension 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 extension request. Please direct any questions regarding this STA extension request to the undersigned at (703) 559-6949.

Respectfully submitted,

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

cc: Paul Blais

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