



August 31, 2021

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:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests a grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing October 16, 2021, to use its Castle Rock, Colorado Ku-band earth station, call sign KL92, to provide launch and early orbit phase (“LEOP”) services for the SES-17 satellite (S3043).² SES-17 is expected to launch on October 16, 2021, and the LEOP period is expected to last approximately five months.³

The SES-17 LEOP operations will be performed at the following frequencies: 13750-14500 MHz in the uplink and 11700-12450 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.⁴ 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 SES-17 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 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.

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 See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01485, File No. SAT-MPL-20200609-00070 (July 31, 2020) (Public Notice).

³ Intelsat is seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

⁴ Thales Alenia Space (“Thales”), the manager of the SES-17 mission, will handle the coordination.

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Finally, Intelsat clarifies that during the SES-17 LEOP mission, Thales will serve as the mission manager. Thales 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 Thales. 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 SES-17 satellite, which in turn will help provide of service from the 67.1° W.L. orbital location. Grant of this request will thereby promote the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

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

cc: Kerry Murray