



January 11, 2022

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")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 Turksat 5B satellite. Turksat 5B was launched on December 18, 2021.³ Intelsat expects the LEOP period to last approximately 180 days.⁴

The Turksat 5B LEOP operations will continue to be performed at the following frequencies: 13999.0 MHz, 14001.0 MHz, and 14499.5 MHz in the uplink, and 11452.6 MHz, 11703.5 MHz, and 11704.5 MHz in the downlink. With the exception of the emission designators,⁵ the proposed operations are within the parameters of the license.⁶

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 Communications Services Information; Actions Taken*, Report No. SES-02426, File No. SES-STA-20211202-01866 (Dec. 22, 2021) (Public Notice).

³ The in-orbit testing and final location for Turksat 5B, which Intelsat understands is licensed by the Republic of Turkey, will be 42.0° E.L.

⁴ Intelsat is also requesting 180 days of STA to support the Turksat 5B LEOP. See Intelsat's Request for 180-day grant of Special Temporary Authority to use Castle Rock, Colorado earth station (KL92) to provide LEOP for Turksat 5B, File No. SES-STA-20211209-01899 (filed Dec. 9, 2021).

⁵ The downlink emission designator is 500KG2D and the downlink carrier is 500 kHz.

⁶ See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02174, File No. SES-MOD-20180611-01388 (June 26, 2019) (Public Notice).

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.⁷ 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. 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.

The 24x7 contact information for the Turksat 5B 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 Kevin Bell.

In further support of this request, Intelsat hereby incorporates by reference Exhibit A of its original request,⁸ which contains waiver requests and herewith attaches Exhibit B, which contains a frequency coordination report for the 13.75-14.0 GHz band, and provides the following technical information for the uplink operations:

Polarization:	Circular
Emission Designator:	1M00F2D
Antenna Gain:	63.7 dBi
EIRP Value:	85.0 dBW
Bandwidth:	1 MHz
Input Power:	125.9 W

Finally, Intelsat clarifies that during the Turksat 5B 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 extension request will allow Intelsat to help launch the Turksat 5B satellite. This will help provide services at the 42.0° 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 extension request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel, Intelsat US LLC
on behalf of Intelsat License LLC

cc: Kerry Murray

⁷ Airbus, the manager of the Turksat 5B mission, will handle the coordination.

⁸ See *supra*, n. 2.