

August 30, 2022

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

Re: Request for 180-day Grant of Special Temporary Authority
Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 180 days of Special Temporary Authority ("STA"),¹ commencing November 7, 2022, to use its Castle Rock, Colorado Ku-band earth station, Call Sign KL92, to provide launch and early orbit phase ("LEOP") services to the Hotbird F2 satellite.² Hotbird F2 is expected to launch on November 7, 2022.³ Intelsat expects the LEOP to last approximately 165 days.⁴

The Hotbird F2 operations will be performed at the following frequencies: 13996.5 MHz, 14002.0 MHz, and 14499.5 MHz in the uplink; and 11702.4 MHz, 11705.3 MHz, 12501.0 MHz, and 12502.4 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.⁵ 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. 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 Hotbird F2 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 or Glen Jones.

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 In support of this request, additional antenna and satellite information, a waiver request, and a 13 GHz report are attached as Exhibits A-C, respectively.

³ Intelsat understands that Hotbird F2 is licensed by France. The in-orbit testing and final location will be 13° W.L.

⁴ Intelsat is seeking 180 days of STA to accommodate potential launch delays.

⁵ Airbus, the manager of the Hotbird F2 mission, will handle the coordination.

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Finally, Intelsat clarifies that during the Hotbird F2 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 Hotbird F2 satellite. This will help provide services at the 13° W.L. location and thereby promotes 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: Franco Hinojosa
Kerry Murray

EXHIBIT A

Intelsat's Request for STA to provide LEOP for Hotbird F2

Earth Station Call Sign	KL92
Antenna size (m)	12.5
Transmit Frequencies (MHz)	13996.5, 14002.0, 14499.5
Receive Frequencies (MHz)	11702.4, 11705.3, 12501.0, 12502.4
Emission Designator	1M00F2D
Polarization	Circular
Bandwidth	1000 kHz
Transmit Gain	63.7 dBi at 13.750 GHz
Maximum EIRP per Carrier (dBW)	83
Maximum EIRP Density per Carrier (dBW/4 kHz)	59
Site Location	Castle Rock, CO
Latitude/Longitude (NAD83)	39° 16' 35.215" N, 104° 48' 22.867" W
Satellite Point(s) of Communication	Hotbird F2
Satellite Call Sign	n/a, see Exhibit B
Satellite Type	Geostationary
Satellite Location	n/a