November 1, 2022

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

Re: Expedited Treatment Requested
Request for Four Days of Special Temporary Authority
Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests four days of Special Temporary Authority ("STA"),[1] commencing November 3, 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] The Hotbird F2 launch has been advanced by five days and is now expected to be November 2, 2022.[3] Intelsat is seeking four days of STA to accommodate the gap in requested authorization between the first day this antenna is now needed for LEOP operations and the beginning of the pending 180-day authorization[4] that was caused by the unexpected advancement of the satellite's launch date.

Intelsat has a pending STA request to use KL92 for 180 days, beginning November 7, 2022, to provide telemetry, tracking, and command services ("TT&C") to Hotbird F2 during its LEOP.[5] The Hotbird F2 LEOP 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.[6] 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

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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.

[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 13.0° W.L.

[4] *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02503, File No. SES-STA-20220830-00927 (Sept. 28, 2022) (Public Notice).

[5] *Id.*

[6] Airbus, the manager of the Hotbird F2 mission, will handle the coordination.

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.

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 13.0° W.L. location and thereby promotes the public interest.

Finally, Intelsat requests that the STA sought herein commence in two days. The advancement of Hotbird F2's launch was unforeseen and is the type of extraordinary event that makes grant of an STA on less than three working days' advance notice appropriate.[7]

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

[7] *See* 47 C.F.R. § 25.120(a).

EXHIBIT A

Intelsat License LLC
Request for Four Days of Special Temporary Authority

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