March 1, 2023

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 ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),[1] commencing April 7, 2023, to use its Castle Rock, Colorado Ku-band earth station, Call Sign KL92, to provide launch and early orbit phase ("LEOP") and telemetry, tracking, and command ("TT&C") services on-station for the Intelsat 40e (S3066) satellite.[2] Intelsat 40e is expected to launch no earlier than April 7, 2023. Intelsat expects the LEOP period to last approximately 60 days.

The Intelsat 40e operations will initially be performed at the following frequencies:

- 14000.5 MHz and 14003.0 MHz (uplink); and
- 12197.5 MHz, 12198.0 MHz, 12198.5 MHz, and 12199.0 MHz (downlink).

Notwithstanding the foregoing, Intelsat may perform TT&C at other frequencies in the full range of the following frequency bands as operational needs may require:

- 14000.0 – 14030.0 MHz (uplink); and
- 12170.0 – 12200.0 MHz (downlink).

The 24x7 contact information for the Intelsat 40e 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 Glen Jones or Mike Ryan.

The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.[3] All operators of satellites in that path will be provided

[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 operational information is attached as Exhibits A.

[3] Maxar, the manager of the Intelsat 40e mission, will handle the coordination.

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.

Finally, Intelsat clarifies that during the Intelsat 40e mission, Maxar will serve as the mission manager. Maxar 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 Maxar. 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 Intelsat 40e satellite. This will allow Intelsat 40e to provide additional capacity at the 91.0° W.L. location and thereby promotes the public interest.

Please direct any questions the undersigned at (703) 559-7799.

Respectfully submitted,

/s/ W. Ray Rutngamlug
W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

cc: Franco Hinojosa

EXHIBIT A

Intelsat's Request for STA to provide LEOP and TT&C for Intelsat 40e

Earth Station	KL92
Antenna Size (m)	12.5
Transmit Frequencies (MHz)	14000.5 and 14003.0; 14000.0 – 14030.0
Receive Frequencies (MHz)	12197.5, 12198.0, 12198.5, and 12199.0; 12170.0 – 12200.0
Emission Designator(s)	1M00F2D
Polarization	Circular
Bandwidth	1 MHz
Transmit Gain	63.7 dBi at 13.75 GHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61.02
Site Location	Castle Rock, CO
Latitude/Longitude (NAD83)	39° 16' 38" N, 104° 48' 26.9" W
Satellite Point(s) of Communication	Intelsat 40e
Satellite Call Sign	S3066
Satellite Type	Geostationary
Satellite Location	n/a