

August 28, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Request for Special Temporary Authority  
Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing September 18, 2018, to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase (“LEOP”) services for the Azerspace-2 satellite. Azerspace-2 is expected to launch on September 18, 2018.<sup>2</sup> Intelsat expects the LEOP period to last approximately 180 days.<sup>3</sup>

The Azerspace-2 LEOP operations will be performed at the following frequencies: 14497.50 MHz and 14499.5 MHz (CP) in the uplink; and 12745.0 MHz, 12745.5 MHz, 12748.25 MHz, and 12748.75 MHz (CP) 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.<sup>4</sup> 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 Azerspace-2 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.

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<sup>1</sup> Intelsat has filed its STA request, FCC Form 159, a \$200.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> The in-orbit testing location for Azerspace-2, which Intelsat understands is licensed by Azerbaijan, will be 63.8° E.L. The final location of Azerspace-2 will be 45.0° E.L.

<sup>3</sup> Intelsat is simultaneously filing a 180-day STA request for this antenna to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

<sup>4</sup> SSL, the manager of the Azerspace-2 LEOP mission, will handle the coordination.

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In further support of this request, Intelsat herewith attaches Exhibit A, which contains requests for waiver. 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 Azerspace-2 LEOP mission, SSL will serve as the mission manager. SSL 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 SSL. 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 Azerspace-2 satellite. This, in turn, will help provide additional capacity from the 45.0° E.L. orbital 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  
Regulatory Counsel  
Intelsat US LLC

cc: Paul Blais