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October 11, 2018

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

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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")[1] previously granted Intelsat to continue using 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.[2] Azerspace-2 was launched on September 25, 2018.[3] Intelsat expects the LEOP period to last approximately 180 days and has a pending 180-day STA request for this antenna to accommodate the longer orbit-raising time period required for an electric propulsion satellite.[4]

The Azerspace-2 LEOP operations will continue to 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 continue to 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.

The 24x7 contact information for the Azerspace-2 LEOP mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)

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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 ("IBFS").

[2] *See Satellite Communications Services Information; Actions Taken*, Report No. SES-02096, File No. SES-STA-20180828-02516 (Sept. 12, 2018) (Public Notice).

[3] 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.

[4] *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02095, File No. SES-STA-20180828-02526 (Sept. 12, 2018) (Public Notice).

[5] SSL, the manager of the Azerspace-2 LEOP mission, will handle the coordination.

(310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

In further support of this extension request, Intelsat incorporates by reference Exhibit A, submitted with its original STA request,[6] 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 continue to 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 continue to 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 continue helping with the launch of the Azerspace-2 satellite. This, in turn, will help provide additional capacity from the 45.0º E.L. orbital location and thereby promotes the public interest.

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
Senior Counsel
Intelsat US LLC

cc: Paul Blais

[6] *See supra* n. 2.