

October 29, 2018

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 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")¹ for 30 days, commencing November 14, 2018, to utilize its Castle Rock, Colorado Ku-band earth station KL92 to provide early orbit phase ("LEOP") services for the Es'hail 2 satellite. Es'hail 2 is expected to be launched on November 14, 2018.² The LEOP period is expected to last approximately thirty days.

The Es'hail 2 LEOP operations will be performed in the following frequency bands: 12756.0 MHz and 13244.0 MHz (RHCP) in the uplink; and 10706.0 MHz and 11205.0 MHz (RHCP) in the downlink (LHCP & RHCP). 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 with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the Es'hail 2 LEOP mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary) (310) 525-5591 – West Coast Operations Center (back-up)

¹ Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² The permanent orbital location for Es'hail 2, which Intelsat understands is licensed by Qatar, will be 25.9° E.L. The in-orbit testing location will be 24.0° E.L.

³ MelCo, the manager of the Es'hail 2 LEOP mission, will handle the coordination.

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Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, as well as a waiver request. 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 Es'hail 2 LEOP mission, MelCo will serve as the mission manager. MelCo 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 MelCo. 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 Es'hail 2 satellite. This, in turn, will enable amateur radio geostationary communications from the 29.5° 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 Senior Counsel Intelsat US LLC

cc: Paul Blais