



**INTELSAT.**

*Envision. Connect. Transform.*

May 16, 2019

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 180 days, commencing upon grant, to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase (“LEOP”) service for Eutelsat-7C, and telemetry, tracking, and command (“TT&C”) services during in-orbit testing and drifting of the satellite to its final location. Eutelsat-7C is expected to launch on June 20, 2019.<sup>2</sup> Intelsat expects to provide LEOP and TT&C services for approximately 210 days.<sup>3</sup>

The Eutelsat-7C LEOP operations will be performed at the following frequencies: 11199.0 MHz, 11200.6 MHz, 11698.2 MHz, and 11699.0 MHz (LHCP) in the downlink; and 13750.40 MHz, 13999.25 MHz, 14250.00 MHz, and 14499.80 MHz (RHCP) in the uplink. 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 Eutelsat-7C LEOP mission is as follows:

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<sup>1</sup> 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”).

<sup>2</sup> The IOT location for Eutelsat-7C, which Intelsat understands is licensed by France, will be 1.7° E.L. The satellite’s final location will be 7° E.L.

<sup>3</sup> Intelsat is seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

<sup>4</sup> SSL, the manager of the Eutelsat-7C mission, will handle the coordination.

Ms. Marlene H. Dortch

May 16, 2019

Page 2

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.

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain a 13 GHz report and waiver requests. 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 Eutelsat-7C 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 Eutelsat-7C satellite and safely insert it into the geostationary arc. This will help provide services at the 7° E.L. 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