



INTELSAT.

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July 17, 2019

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 to IntelSat² 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 (“IOT”) and drifting of the satellite to its final location. Eutelsat-7C was launched on June 20, 2019.³ IntelSat expects to provide LEOP and TT&C services for approximately 210 days.⁴

The Eutelsat-7C LEOP operations will continue to 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

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-02174, File No. SES-STA-20190516-00664 (June 26, 2019) (Public Notice).

³ 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.

⁴ IntelSat is concurrently seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite. See *Satellite Communications Services, Satellite Radio Applications Accepted For Filing*, Report No. SES-02179, File No. SES-STA-20190516-00667 (July 3, 2019) (Public Notice).

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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 Eutelsat-7C 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.

In further support of this request, Intelsat incorporates by reference Exhibits A and B⁶ included with its original STA request, 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 extension request will allow Intelsat to help safely insert the Eutelsat-7C satellite into the geostationary arc. This will help provide services at the 7° E.L. location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this STA extension request. Please direct any questions to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais

⁵ SSL, the manager of the Eutelsat-7C mission, will handle the coordination.

⁶ *See supra* n. 2.