

August 30, 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")¹ for 30 days, commencing September 30, 2019, to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase ("LEOP") services for Eutelsat 5 West B ("Eutelsat 5WB"). Eutelsat 5WB is expected to launch on September 30, 2019.² Intelsat expects to provide LEOP services for approximately 10 days.

The LEOP operations will be performed at the following frequencies: 12501.0 MHz, 12502.0 MHz, 11198.8 MHz, and 11199.8 MHz (LHCP) in the downlink; and 14251.0 MHz and 14499.8 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.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.

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 The in-orbit testing location for Eutelsat 5WB, which Intelsat understands is licensed by France, will be 1.6° E.L. The satellite's final location will be 5° W.L.

³ Northrup Grumman Innovation Systems, Inc. ("NGIS"), the manager of the Eutelsat 5WB mission, will handle the coordination.

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The 24x7 contact information for the Eutelsat 5WB LEOP mission is as follows:

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Ph.: (703) 559-7701 – East Coast Operations Center (primary) (310) 525-5591 – West Coast Operations Center (back-up)
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Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat herewith attaches Exhibit A, which contains 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 5WB LEOP mission NGIS will serve as the mission manager. NGIS 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 NGIS. 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 5WB satellite and safely insert it into the geostationary arc. This will help provide services at the 5° W.L. location and thereby promotes the public interest.

Please direct any questions regarding this 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