



**INTELSAT.**

*Envision. Connect. Transform.*

January 10, 2020

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”)<sup>1</sup> previously granted to IntelSat<sup>2</sup> to use its Castle Rock, Colorado Ku-band earth station (Call Sign KL92) to provide launch and early orbit phase (“LEOP”) services for the JCSAT-18 satellite, which was launched on December 16, 2019.<sup>3</sup> IntelSat expects to provide LEOP services to the satellite for approximately 45 days.

The LEOP operations will continue to be performed at the following frequencies: 12748.50 MHz and 12749.50 MHz (RHCP) in the downlink; and 13752.50 MHz and 14499.00 MHz (RHCP) in the uplink. 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.<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 JCSAT-18 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.

<sup>2</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02227, File No. SES-STA-20191122-01552 (Dec. 18, 2019) (Public Notice).

<sup>3</sup> The in-orbit testing location for JCSAT-18, which IntelSat understands is licensed by Japan, will be 148.0° E.L. The satellite’s final location will be 150.0° E.L.

<sup>4</sup> Boeing, the manager of the JCSAT-18 mission, will handle the coordination.

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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-C of its original request,<sup>5</sup> which contain waiver requests and a 13.75 GHz – 14.0 GHz report. 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.

Intelsat clarifies that during the JCSAT-18 LEOP mission Boeing will serve as the mission manager. Boeing 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 Boeing. 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 launch the JCSAT-18 satellite and safely insert it into the geostationary arc. This will help provide services at the 150.0° 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 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

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<sup>5</sup> See *supra* n. 2.