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February 11, 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”)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”) services for the BB4A satellite, which was launched on January 16, 2020.³ Intelsat now expects to provide LEOP services to the satellite for a total of six months.

The LEOP operations will continue to be performed at the following frequencies: 11701.60 MHz (LHCP) and 11704.00 MHz (LHCP) in the downlink; and 14000.00 MHz (LHCP) and 14499.80 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.⁴ All operators of satellites in that path have been 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 See Intelsat License LLC Request for 30-day Grant of Special Temporary Authority to Use Castle Rock, Colorado Earth Station KL92 to Provide LEOP Services for the BB4A Satellite, File No. SES-STA-20200102-00058 (IBFS grant).

³ The in-orbit testing and final location for BB4A, which Intelsat understands is licensed by France, will be 14.0° E.L.

⁴ Thales Alenia Space (“Thales”), the manager of the BB4A mission, will handle the coordination.

The 24x7 contact information for the BB4A 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 Exhibit A of its original request⁵ 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.

Intelsat clarifies that during the BB4A LEOP mission Thales will continue to serve as the mission manager. Thales builds and sends the commands to the Intelsat antenna, which processes and executes the commands. Telemetry received by Intelsat is forwarded to Thales. Intelsat performs the ranging sessions by sending a tone to the spacecraft periodically. Intelsat remains in control of the baseband unit, RF equipment, and antenna.

Grant of this STA extension request will allow Intelsat to help launch the BB4A satellite and safely insert it into the geostationary arc. This will help provide services at the 14.0° 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

⁵ See *supra* n. 2.