

March 19, 2020

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Request for Further Extension of Special Temporary Authority
Castle Rock, Colorado Earth Station E990323

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA"), previously granted to Intelsat² to use its Castle Rock, Colorado Ku-band earth station (Call Sign E990323) to provide back-up telemetry, tracking, and command ("TT&C") services for HYLAS-1 on-station at 79.0° W.L.³ Intelsat is currently providing primary TT&C services to HYLAS-1 using Intelsat's Hagerstown, Maryland Ku-band antenna (Call Sign KA258).⁴ Intelsat expects to provide TT&C for HYLAS-1 at 79.0° W.L. until the satellite begins its redeployment, which is currently scheduled to begin March 23, 2020.⁵

HYLAS-1 TT&C operations will continue to be performed in the following frequencies:

- 17302.048 MHz (H, LHCP) and 17305.051 MHz (H, RHCP) in the uplink; and
- 11701.008 MHz (V, LHCP) and 11702.808 MHz (V, RHCP) in the downlink.

All potentially affected operators have been provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. In the extremely unlikely

¹ Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System.

² See, e.g., Satellite Communications Services Information; Actions Taken, Report No. SES-02245, File No. SES-STA-20200217-00161 (Feb. 26, 2020) (Public Notice).

³ HYLAS-1 is licensed by the United Kingdom.

⁴ See, e,g., Intelsat License LLC Request for Further Extension of Special Temporary Authority to Use Hagerstown, Maryland Earth Station KA258 to Provide TT&C Services for the HYLAS-1 Satellite, File No. SES-STA-20200106-00014 (filed Jan. 6, 2020).

⁵ Intelsat is seeking an additional 30 days of STA to accommodate any unexpected delay to the satellite's redeployment and has also filed an STA to use this antenna to support the satellite's upcoming drift. See Satellite Communications Services Information; Actions Taken, Report No. SES-02250, File No. SES-STA-20200312-00241 (Mar. 18, 2020) (Public Notice).

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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.

The 24x7 contact information for the HYLAS-1 TT&C operations 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 B of its original request, 6 which contain waiver requests.

Grant of this further STA extension request will allow Intelsat to help the operator of HYLAS-1 safely station-keep the satellite. This, in turn, will help ensure safe space operations and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this further 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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⁶ See Satellite Communications Services Information; Actions Taken, Report No. SES-02235, File No. SES-STA-20200106-00015 (Jan. 22, 2020) (Public Notice).