

S2960 SAT-LOA-20160411-00035  
Intelsat License LLC  
JCSAT-RA

IB2016000890



File # SAT-LOA-20160411-00035

Call Sign S2960 Grant Date 07/12/18  
(or other identifier)

From 07/12/18 Term Dates To: 12/31/19

Approved: Jose Albuquerque

Approved by OMB  
3060-0678

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APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

Application for Authority to Drift to and Operate JCSAT-RA, an In-orbit Satellite, at 169.0 E.L.

1-8. Legal Name of Applicant			
Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA Name:		Fax Number:	703-559-8539
Street:	c/o Intelsat Corporation 7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:	Susan H. Crandall		

**ATTACHMENT TO GRANT**  
**Intelsat License LLC**  
 [IBFS File No. SAT-LOA-20160411-00035]

<b>IBFS File No(s):</b>	SAT-LOA-20160411-00035	<b>GRANTED – With Conditions</b>    <b>International Bureau Satellite Division</b>
<b>Licensee/Grantee:</b>	Intelsat License LLC	
<b>Call Sign:</b>	S2960	
<b>Satellite Name:</b>	JCSAT-RA	
<b>Orbital Location: (required station-keeping tolerance)</b>	169.0° E.L.	
<b>Administration:</b>	United States of America	
<b>Nature of Service:</b>	Fixed-Satellite Service (FSS)	
<b>Scope of Grant:</b>	Grant of authority to operate the JCSAT-RA space station at the 169.0° E.L. orbital location to provide fixed-satellite service (FSS). Authority to conduct telemetry, tracking and command operations necessary to drift JCSAT-RA from the 128.0° E.L. orbital location to the 169.0° E.L. orbital location, and maintain it upon its arrival at that location. <sup>1</sup>	
<b>Previous Grant(s):</b>	N/A	
<b>Service Area(s):</b>	C-band: Asia and Hawaii. Ku-band: Japan, Asia, and Global. <i>See Section S6, Schedule S Tech Report and Engineering Statement at 2.</i>	
<b>Frequencies:</b>	3940-4200 MHz (space-to-Earth) 6225-6485 MHz (Earth-to-space) 12.2-12.75 GHz (space-to-Earth) 13.8-14.5 GHz (Earth-to-space)  Telemetry, tracking, & command center frequencies: 4199.55 MHz (space-to-Earth) (Beacon) 12.2485 GHz (space-to-Earth) (Beacon) 12.7472 GHz(space-to-Earth) (Beacon) 12.74835 GHz (space-to-Earth) 12.74975 GHz (space-to-Earth) 13.9935 GHz (Earth-to-space) 14.496 GHz (Earth-to-space)	
<p><b>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission’s rules not waived herein. This grant is also subject to the following conditions:</b></p> <ol style="list-style-type: none"> <li>Intelsat must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, coordination, due diligence, and notification process of this space station, in accordance with the ITU Radio Regulations. Intelsat will be held responsible for all cost-recovery fees associated with ITU filings. No protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, coordination agreements are successfully completed. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. See 47 CFR § 25.111.</li> </ol>		

<sup>1</sup>Telemetry, tracking and command (TT&C) operations will be conducted through earth stations located in Yokohama, Japan and Ibaraki, Japan. *See Engineering Statement at 7.*

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2. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
3. Intelsat must operate JCSAT-RA at the 169.0° E.L. orbital location in compliance with all existing or future coordination agreements for this location. In the absence of a coordination agreement, such communications must comply with applicable provisions of the ITU Radio Regulations as the Commission cannot guarantee the success of the required coordination.
4. While at the 169.0° E.L. orbital location, Intelsat must maintain the JCSAT-RA space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
5. The Commission has exchanged letters with the Telecommunications Regulatory Authority of Japan to ensure a mutual understanding regarding the operations of the JCSAT-RA space station. The letters are attached to this grant and the understandings and factual basis for those understandings are a material consideration for this grant of authority.
6. The operation of JCSAT-RA and associated earth stations must comport with the applicable uplink and downlink limits in 47 CFR § 25.140(a)(3) of the Commission's rules, unless Intelsat coordinates any non-conforming operations with the operations of U.S.-licensed geostationary orbit space stations within 6 degrees of the 169.0° E.L. orbital location. Non-conforming operation must also be coordinated with respect to those operations of non-U.S.-licensed space stations within 6 degrees of 169.0° E.L. involving approved communications with U.S.-licensed earth stations.
7. Intelsat's requests for waiver of sections 25.210(a)(3), and 25.210(i)(1) of the Commission's rules, 47 CFR §§ 25.210(a)(3), and 25.210(i)(1), are moot. Section 25.210(a)(3) requires that space stations in the FSS used for domestic service in the 3700-4200 MHz and 5925-6425 MHz frequency bands be capable of switching polarization sense upon ground command. Section 25.210(i)(1) requires space station antennas in the FSS to be designed to meet a cross-polarization isolation of at least 30 dB within the primary coverage area of the antenna. Sections 25.210(a)(3) and 25.210(i)(1) were eliminated as part of a recent Commission-level order streamlining Part 25 rules governing satellite communications.
8. The power flux-density (PFD) at the Earth's surface produced by the emissions from the JCSAT-RA space station, in the 3940-4200 MHz and 12.2-12.75 GHz frequency bands (space- to-Earth), must not exceed the applicable power flux-density limits contained in No.21.16 in Article 21 of the ITU Radio Regulations.
9. Intelsat's request for a waiver of 47 CFR § 2.106 of the Commission's rules to allow the use of the 12.2-12.7 GHz frequency band (space-to-Earth) on an unprotected, non-interference basis IS GRANTED. The 12.2-12.7 GHz frequency band is allocated to the Broadcasting-Satellite Service (BSS) in ITU Region 2 and the United States. Intelsat states that JCSAT-RA will have incidental coverage of U.S. territory and possessions in or bordering the Pacific Ocean. JCSAT-RA's operations shall be on a non-interference and non-protected basis within the United States and its territories located in ITU Region 2. Additionally, JCSAT-RA will protect terrestrial station operations by complying with ITU PFD limits specified in No. 21.16 of the ITU Radio Regulations. As a non-conforming user of the 12.2-12.7 GHz band in ITU Region 2, JCSAT-RA must not cause harmful interference to existing and future authorized users who are operating in accordance with the Table of Allocations in ITU Region 2 and must accept interference from such authorized users. Waiver is justified because FSS operations in these bands are consistent with No. 5.492 of the ITU Radio Regulations and there are no U.S. BSS satellites transmitting from orbital locations within 15.8 degrees of the 169.0° E.L. orbital location.

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10. Intelsat's request for a waiver of 47 CFR § 2.106 of the Commission's rules to permit the provision of FSS within Region 2 and the United States in the 12.7-12.75 GHz frequency band (space-to-Earth) IS GRANTED<sup>2</sup>, subject to the following conditions:
- a. Intelsat shall not cause any harmful interference to existing and future authorized users operating in accordance with the U.S. Table of Frequency Allocations and shall accept any interference from authorized users, including CARS operators, BAS operators, Private Operational Fixed Point-to-Point Service (OFS) operators and Common Carrier Local TV Transmission Service (LTTS) operators;
  - b. In the event of harmful interference to any authorized services operating in accordance with the ITU Table of Frequency Allocations resulting from Intelsat's use of the 12.7-12.75 GHz band in Region 2, Intelsat shall immediately cease operations in that band;
  - c. Intelsat is required to inform its customers in writing, including end-users receiving service from resellers accessing capacity on JCSAT-RA, that service:
    - i.) shall be discontinued should a report of harmful interference resulting from this service occur;
    - ii.) is being provided pursuant to authority subject to a non-harmful interference basis, and that the customers therefore are not protected from harmful interference resulting from services that are allocated to this frequency band;
  - d. In the event that Intelsat receives any report of harmful interference, Intelsat shall inform the Commission of this and provide details of how it has been resolved;
  - e. To further protect services in this band, the power flux density limits (PFD) at the surface of the Earth for transmissions from the satellite in the band 12.7-12.75 GHz shall not exceed the limits specified in No. 21.16 of the ITU Radio Regulations, Table 21-4.<sup>3</sup>
11. In the 13.8-14.0 GHz (Earth-to-space) frequency band, receiving space stations in the FSS must not claim protection from radiolocation transmitting stations operating in accordance with footnote US356 to the United States Table of Frequency Allocations, 47 CFR § 2.106, US356.
12. Operations of any earth station in the United States and its possessions communicating with the JCSAT-RA space station in the 13.8-14.0 GHz (Earth-to-space) frequency band must comply with footnote US356 to the United States Table of Frequency Allocations, 47 CFR § 2.106, US356, which specifies a mandatory minimum antenna diameter of 4.5 meters and recommended minimum and maximum equivalent isotropically radiated powers (e.i.r.p.). Operations of any earth station located outside the United States and its possessions communicating with the JCSAT-RA space station in the 13.8-14.0 GHz (Earth-to-space) frequency band must be consistent with No. 5.502 to the ITU Radio Regulations, which specifies a mandatory minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.
13. Operations of JCSAT-RA in the 14.47-14.5 GHz (Earth-to-space) frequency band is subject to the terms of footnote US342 to the United States Table of Frequency Allocations, 47 CFR §2.106, US342 and No.

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<sup>2</sup> See 47 C.F.R. § 2.106. The 12.7-12.75 GHz frequency band (Earth-to-space) is allocated to the Fixed Service, Mobile Service, and Fixed-Satellite Service (Earth-to-space) in ITU Region 2 and the United States. Intelsat states that JCSAT-RA will operate in the 12.7-12.75 GHz frequency bands in the space-to-Earth direction, which is in accordance with the ITU Region 3 allocation. See Engineering Statement at 6.

<sup>3</sup> Article 21.16 of the International Radio Regulations imposes power flux density (PFD) limits on satellite downlink transmissions in this band in ITU Regions 1 and 3 in order to protect terrestrial services. As JCSAT-RA's non-conforming downlink transmissions in Region 2 are also in a terrestrial service band, we impose the same PFD limits on JCSAT-RA's Region 2 downlink transmissions in this band.

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5.149 of the ITU Radio Regulations, which urge applicants to take all practicable steps to protect the radio astronomy service from harmful interference.

- 14. Prior to commencing operations with the JCSAT-RA space station, Intelsat must file with the Commission the information required by section 25.172 of the Commission's rules, 47 CFR § 25.172.
- 15. The license will end on December 31, 2019. The term may be extended pursuant to a license modification or terminated earlier in the event that a transfer of control of the satellite is sought and approved.


Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

<b>Action Date:</b>	July 12, 2018	
<b>Term Dates</b>	<b>From:</b> July 12, 2018	<b>To:</b> December 31, 2019

**Approved:**

  
 Jose P. Albuquerque  
 Chief, Satellite Division

9-16. Name of Contact Representative			
Name:	Jennifer Hindin	Phone Number:	202&#8722;719&#8722;4975
Company:	Wiley Rein LLP	Fax Number:	202&#8722;719&#8722;7049
Street:	1776 K Street, NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -
Attention:		Relationship:	Legal Counsel

**CLASSIFICATION OF FILING**

<p>17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.</p> <p>a.</p> <p>(N/A) a1. Earth Station</p> <p><input checked="" type="radio"/> a2. Space Station</p>	<p>b.</p> <p><input checked="" type="radio"/> b1. Application for License of New Station</p> <p>(N/A) b2. Application for Registration of New Domestic Receive-Only Station</p> <p>(N/A) b3. Amendment to a Pending Application</p> <p>(N/A) b4. Modification of License or Registration</p> <p>(N/A) b5. Assignment of License or Registration</p> <p>(N/A) b6. Transfer of Control of License or Registration</p> <p>(N/A) b7. Notification of Minor Modification</p> <p>(N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite</p> <p><input type="radio"/> b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States</p> <p><input type="radio"/> b10. Replacement Satellite Application - no new frequency bands</p> <p><input type="radio"/> b11. Replacement Satellite Application - new frequency bands (Not eligible for streamlined processing)</p> <p><input type="radio"/> b12. Petition for Declaratory Ruling to be Added to the Permitted List</p> <p>(N/A) b13. Other (Please specify)</p>
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17c. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity     Noncommercial educational licensee

Other (please explain):

17c. Fee Classification    BNY – Space Station (Geostationary)

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:

Not Applicable

19. If this filing is an amendment to a pending application enter:

(a) Date pending application was filed:

Not Applicable

(b) File number of pending application:

Not Applicable

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:	
<input checked="" type="checkbox"/> a. Fixed Satellite <input type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input type="checkbox"/> d. Earth Exploration Satellite <input type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)	
21. STATUS: Choose the button next to the applicable status. Choose only one. <input type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier	22. If earth station applicant, check all that apply. Not Applicable
23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities: <input type="radio"/> Connected to a Public Switched Network <input type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A	
24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s). <input checked="" type="checkbox"/> a. C-Band (4/6 GHz) <input checked="" type="checkbox"/> b. Ku-Band (12/14 GHz) <input type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower:    Frequency Upper: (Please specify additional frequencies in an attachment)	



TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- (N/A) a. Fixed Earth Station
- (N/A) b. Temporary-Fixed Earth Station
- (N/A) c. 12/14 GHz VSAT Network
- (N/A) d. Mobile Earth Station
- e. Geostationary Space Station.
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY: Not Applicable

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.) Not Applicable

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.  Yes  No

ALIEN OWNERSHIP

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	

**BASIC QUALIFICATIONS**

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?  
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes  No

Engineering Statement

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes  No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes  No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes  No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes  No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.  Yes  No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.  Yes  No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC, pursuant to Section 25.114 of the rules of Federal Communications Commission, hereby requests authority to drift to and operate JCSAT-RA, an in-orbit satellite, at the 169.0 E.L. orbital location.

Narrative & Exhibits

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

Beam Diagrams

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)     Limited Liability Company

45. Name of Person Signing  
Susan H. Crandall

46. Title of Person Signing  
Assoc. Gen. Counsel, Intelsat Corporation

47. Please supply any need attachments.

1:

2:

3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Completed Schedule S

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**



Federal Communications Commission  
Washington, D.C. 20554

June 27, 2018

Mr. Keisuke Takachi  
Director of Fixed and Satellite Radio Communications Division,  
Radio Department, Telecommunications Bureau,  
Ministry of Internal Affairs and Communications  
2-1-2, Kasumigaseki,  
Chiyoda-ku, Tokyo 100-8926  
JAPAN  
Tel: +81-3-5253-5901

Re: Operations of the JCSAT-RA Satellite

Dear Mr. Takachi:

This letter is to confirm the informal understanding of the Ministry of Internal Affairs and Communications (MIC) and the Federal Communications Commission (FCC) concerning the JCSAT-RA satellite.

The satellite is currently located at the 128° E.L. orbital location. JCSAT-RA is capable of operating using the following frequencies: 3940-4200 MHz and 12.2-12.75 GHz (downlink); 6225-6485 MHz and 13.8-14.5 GHz (uplink). Telecommand, telemetry, and control operations for the satellite use the 4199.55 MHz, 12.2485 GHz, 12.7472 GHz, 12.74835 GHz and 12.74975 GHz (space-to-earth), and 13.9935 GHz and 14.496 GHz (Earth-to-space) center frequencies. Japan has registered the satellite with the Secretary General of the United Nations, pursuant to the 1976 U.N. Convention on Registration of Objects Launched into Outer Space.

SKY Perfect JSAT Corporation (JSAT), a Japanese company, is a party to a commercial agreement with Intelsat License LLC (Intelsat), a United States (U.S.) company, concerning operation of the 3940-4200 MHz and 12.2-12.75 GHz (downlink); 6225-6485 MHz and 13.8-14.5 GHz (uplink) frequency bands on JCSAT-RA at the 169.0° E.L. orbital location, and of the telecommand, telemetry, and control center frequencies on JCSAT-RA of 4199.55 MHz, 12.2485 GHz, 12.7472 GHz, 12.74835 GHz and 12.74975 GHz (space-to-earth), and 13.9935 GHz and 14.496 GHz (Earth-to-space), through earth stations located in Yokohama, Japan and Iburaki, Japan, to effect the drift of the satellite from the 128° E.L. orbital location to the 169.0° E.L. orbital location and to maintain it upon its arrival at 169.0° E.L. Intelsat has applied for a license from the U.S. Administration in connection with the operations of JCSAT-RA in those bands, consistent with the U.S. ITU filings at 169.0° E.L., which are known as USASAT-60J, USASAT-60V, and USASAT-55V.

It is my understanding that our agencies have concurred on the following issues concerning the operation of the JCSAT-RA satellite, contingent upon completion of the FCC licensing process:

- 1) Upon the satellite's departure from the 128° E.L. orbital location, and while at the 169.0° E.L. orbital location, operations of JCSAT-RA will be subject to the authority of the FCC.
- 2) While JCSAT-RA is subject to FCC authority, and, in the event of extraordinary circumstances, the FCC may direct Intelsat to cease or modify operations of JCSAT-RA, or any portion of the satellite, without the need for consultation with or approval from the MIC, for example, to comply with a direction by the U.S. President under Section 706(c) of the Communications Act of 1934, as amended, 47 U.S.C. § 606(c), or in the event of a satellite



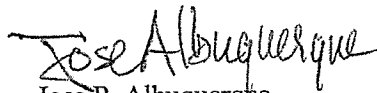
anomaly presenting an imminent danger, and Intelsat will be required to comply with any such direction. It is understood that, if operations of JCSAT-RA are ceased or modified under this condition, the FCC will inform the MIC, at the earliest possible opportunity, about the action taken by the FCC.

- 3) Intelsat and the FCC will be responsible for taking action necessary for compliance with the ITU Radio Regulations (in particular the coordination and notification procedures) for JCSAT-RA at the 169.0° E.L. orbital location.
- 4) The FCC will consult with the MIC if practicable, prior to any relocation of the satellite from the 169.0° E.L. orbital location, or as soon thereafter as possible.
- 5) The MIC will not object to use of the JCSAT-RA satellite by the FCC for claiming bringing into use or continuing the use of frequency assignments at 169.0° E.L., and in particular with respect to the ITU filings known as USASAT-60J, USASAT-60V, and USASAT-55V.

Any notices, inquiries, and correspondence from the MIC concerning these matters should be directed to the Chief, Satellite Division, International Bureau, at [Jose.Albuquerque@fcc.gov](mailto:Jose.Albuquerque@fcc.gov) with a copy to [Karl.Kensinger@fcc.gov](mailto:Karl.Kensinger@fcc.gov), on the part of the FCC. The FCC will direct any notices, inquiries, and correspondence from the FCC concerning these matters to Ministry of Internal Affairs and Communications Fixed and Satellite Radio Communications Division Radio Department, Telecommunications Bureau, at [mss@soumu.go.jp](mailto:mss@soumu.go.jp).

If the foregoing corresponds to your understanding of the informal arrangements between our agencies concerning JCSAT-RA, please confirm by return letter. Thank you.

Sincerely,



Jose P. Albuquerque  
Chief, Satellite Division  
International Bureau

# Telecommunications Bureau

## Ministry of Internal Affairs and Communications

2-1-2 Kasumigaseki, Chiyoda-ku, Tokyo 100-8926 JAPAN  
Telephone: +81 3 5253 5901    Telefax: +81 3 5253 5903

MIC/TB 308  
11 July 2018

Mr. Jose P. Albuquerque  
Chief, Satellite Division, International Bureau  
Federal Communications Commission  
Washington, D.C. 20554

### Return letter for “Re: Operations of the JCSAT-RA Satellite”

Dear Mr. Jose P. Albuquerque,

The Ministry of Internal Affairs and Communications (MIC) thanks the Federal Communications Commission (FCC) for its letter which is to confirm the informal understanding concerning the JCSAT-RA satellite.

The following matters presented by the FCC are consistent with the understanding of the MIC.

- 1) *Upon the satellite's departure from the 128° E.L. orbital location, and while at the 169.0° E.L. orbital location, operations of JCSAT-RA will be subject to the authority of the FCC.*
- 2) *While JCSAT-RA is subject to FCC authority, and, in the event of extraordinary circumstances, the FCC may direct Intelsat to cease or modify operations of JCSAT-RA, or any portion of the satellite, without the need for consultation with or approval from the MIC, for example, to comply with a direction by the U.S. President under Section 706(c) of the Communications Act of 1934, as amended, 47 U.S.C. § 606(c), or in the event of a satellite anomaly presenting an imminent danger; and Intelsat will be required to comply with any such direction. It is understood that, if operations of JCSAT-RA are ceased or modified under this condition, the FCC will inform the MIC, at the earliest possible opportunity, about the action taken by the FCC.*
- 3) *Intelsat and the FCC will be responsible for taking action necessary for compliance with the ITU Radio Regulations (in particular the coordination and notification procedures) for JCSAT-RA at the 169.0° E.L. orbital location.*
- 4) *The FCC will consult with the MIC if practicable, prior to any relocation of the satellite from the 169.0° E.L. orbital location, or as soon thereafter as possible.*
- 5) *The MIC will not object to use of the JCSAT-RA satellite by the FCC for claiming bringing into use or continuing the use of frequency assignments at 169.0° E.L., and in*

*particular with respect to the ITU filings known as USASAT-60J, USASAT-60V, and USASAT-55V.*

Any notices, inquiries, and correspondence from the FCC concerning these matters should be directed to [mss@soumu.go.jp](mailto:mss@soumu.go.jp), of the MIC. MIC will direct any notices, inquiries, and correspondence from MIC concerning these matters to Mr. Jose Albuquerque ([Jose.Albuquerque@fcc.gov](mailto:Jose.Albuquerque@fcc.gov)) with a copy to [Karl.Kensinger@fcc.gov](mailto:Karl.Kensinger@fcc.gov), of the FCC.

Sincerely yours,

A handwritten signature in black ink that reads "Keisuke Takachi". The signature is written in a cursive style with a large initial 'K'.

**Keisuke TAKACHI**  
Director of Fixed and Satellite Radio Communications Division  
Radio Department  
Ministry of Internal Affairs and Communications