



INTELSAT.

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December 18, 2018

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

Re: Request for Special Temporary Authority to Drift JCSAT-RA to, and Operate at, 168.9° E.L.
Call Sign: S2960

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests 30 days, commencing January 7, 2019, of Special Temporary Authority (“STA”)¹ to drift JCSAT-RA (Call Sign S2960) from 169.0° E.L. to 168.9° E.L., and operate the satellite temporarily at 168.9° E.L. IntelSat will also be filing a 180-day STA request to support this redeployment.

The JCSAT-RA satellite is currently operating at 169.0 E.L.² Subject to receipt of Federal Communications Commission approval, the satellite will be relocated to 168.9° E.L. with an anticipated drift start date of January 7, 2019. The drift of the JCSAT-RA satellite is expected to take approximately one week. IntelSat is relocating JCSAT-RA to accommodate the arrival of Horizons 3e (S2947) at 169.0° E.L. following the satellite’s successful launch.

During the drift of the JCSAT-RA satellite, IntelSat will utilize only the satellite’s telemetry, tracking, and control (“TT&C”) frequencies and will follow industry practices for coordinating TT&C transmission during the relocation process. The specific TT&C frequencies are: 4199.55 MHz (beacon), 12.2485 GHz (beacon), 12.7472 GHz (beacon), 12.74835 GHz, and 12.74975 GHz (space-to-Earth); and 13.9935 GHz and 14.496 GHz (Earth-to-space).

¹ IntelSat has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau’s Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01330, File No. SAT-LOA-20160411-00035 (July 13, 2018) (Public Notice).

Ms. Marlene H. Dortch

December 18, 2018

Page 2

Once on-station at 168.9° E.L., Intelsat will also operate on the following communications frequencies: 3940-4200 MHz, 6225-6425 MHz, 6425-6485 MHz, 12200-12250 MHz, 12250-12500 MHz, 12500-12750 MHz, 13750-13997 MHz, 13997-14000 MHz, 14000-14250 MHz, and 14250-14500 MHz

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 168.9° E.L., Intelsat will operate the communications payload in conformance with its coordination agreements concerning the nominal 169.0° E.L. location.

Further, Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat is not aware of any FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with JCSAT-RA at 168.9° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with JCSAT-RA that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

In support of this STA request, Intelsat requests that the prior waivers granted for JCSAT-RA for Section 2.106 regarding the 12.2-12.7 GHz and 12.7-12.75 bands at 169.0° E.L. be extended to JCSAT-RA at 168.9° E.L.

Grant of this STA request is in the public interest because it will allow Intelsat to safely station-keep JCSAT-RA and Horizons 3e at the nominal 169° E.L.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers