



**INTELSAT.**

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March [4], 2019

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

Re: Request for Further Extension of 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 an additional 30 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted IntelSat 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.<sup>2</sup>

The JCSAT-RA satellite is permanently licensed to operate at 169.0 E.L.,<sup>3</sup> and is currently operating at 168.9° E.L. subject to STA.<sup>4</sup> IntelSat relocated JCSAT-RA to accommodate the arrival of Horizons 3e (S2947) at 169.0° E.L. following the satellite’s successful launch. IntelSat is also filing a 180-day STA request to accommodate the temporary relocation.

On-station at 168.9° E.L., IntelSat will continue to utilize the satellite’s telemetry, tracking, and control (“TT&C”) and communications frequencies. 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). The specific communications frequencies are: 3940-4200 MHz, 6225-6425 MHz, 6425-6485 MHz, 12200-12250 MHz, 12250-

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

<sup>2</sup> See, e.g. *Policy Branch Information; Actions Taken*, Report No. SAT-01368, File No. SAT-STA-20190128-00003 (Feb. 1, 2019) (Public Notice).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01330, File No. SAT-LOA-20160411-00035 (July 13, 2018) (Public Notice).

<sup>4</sup> See *supra* at n.2.

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12500 MHz, 12500-12750 MHz, 13750-13997 MHz, 13997-14000 MHz, 14000-14250 MHz, and 14250-14500 MHz

Grant of this STA further extension request will not result in increased risk of harmful interference. On-station at 168.9° E.L., Intelsat will continue to operate the satellite 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 further extension 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 further extension request is in the public interest because it will allow Intelsat to continue safely station-keep JCSAT-RA at the nominal 169° E.L.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA further extension 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