



INTELSAT.

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March 4, 2019

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 180 days of Special Temporary Authority (“STA”)¹ to operate JCSAT-RA (Call Sign S2960) temporarily at 168.9° E.L.

The JCSAT-RA satellite is permanently licensed to operate at 169.0 E.L.,² and is currently operating at 168.9° E.L. subject to STA.³ Intelsat relocated JCSAT-RA to accommodate the arrival of Horizons 3e (S2947) at 169.0° E.L. following the satellite’s successful launch.

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, 12250-12500 MHz, 12500-12750 MHz, 13750-13997 MHz, 13997-14000 MHz, 14000-14250 MHz, and 14250-14500 MHz

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).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01368, File No. SAT-STA-20190128-00003 (Feb. 1, 2019) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01366, File No. SAT-STA-20181218-00091 (Dec. 21, 2018) (Public Notice).

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Grant of this STA 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.

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 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 request. Please direct any questions regarding this 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