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December 26, 2019

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 to Operate JCSAT-RA at 168.9° E.L.; Call Sign: S2960

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests an additional 180 days of Special Temporary Authority (“STA”)¹ previously granted to IntelSat to operate JCSAT-RA (Call Sign S2960) temporarily at 168.9° E.L.²

The JCSAT-RA satellite is permanently licensed to operate at 169.0 E.L.,³ and is currently operating at 168.9° E.L. subject to STA.⁴ IntelSat relocated JCSAT-RA to accommodate the arrival of Horizons 3e (S2947) at 169.0° E.L. following the satellite’s successful launch. Additionally, IntelSat has filed an application to extend the license term of JCSAT-RA through December 31, 2024.⁵

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

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, e.g., *Policy Branch Information, Actions Taken*, Report No. SAT-01426, File No. SAT-STA-20190920-00097 (Nov. 8, 2019) (Public Notice).

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

⁴ See *supra* n. 2.

⁵ Application of IntelSat License LLC to Modify Authorization for JCSAT-RA, Call Sign S2960, File No. SAT-MOD-20191226-00153 (filed Dec. 26, 2019).

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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.

Grant of this further STA 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.

In support of this further STA 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 further STA extension request is in the public interest because it will allow Intelsat to continue safely station-keep and operate JCSAT-RA at the nominal 169° E.L. orbital location.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this 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
Jennifer Balatan