

June 24, 2020

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

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests an additional 180 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat to operate JCSAT-RA (Call Sign S2960) 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.

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.

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.

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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., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01448, File No. SAT-STA-20191226-00154 (Feb. 28, 2020) (Public Notice).

<sup>3</sup> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01448, File No. SAT-MOD-20191226-00153 (Feb. 28, 2020) (Public Notice).

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

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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 Federal Communications 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: Jay Whaley  
Jennifer Balatan