



April 8, 2022

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Extension of Special Temporary Authority to Communicate with
JCSAT-1C Outside the U.S. and its Territorial Waters, Call Sign E120106

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to operate with the JCSAT-1C space station for purposes of serving U.S.-licensed earth station aboard aircraft ("ESAA") terminals operating outside the U.S. and its territorial waters. JCSAT-1C is an in-orbit Ku-band fixed satellite service ("FSS") satellite licensed by Japan and operating at 150.0° E.L. Intelsat will separately file a petition for declaratory ruling to add JCSAT-1C to the permitted list for the limited purpose of serving U.S.-licensed ESAA outside the territory of the United States.³

Intelsat requests continued STA to communicate with the JCSAT-1C satellite for the limited purpose of supporting mobility services abroad. Operating at 150.0° E.L., the satellite covers primarily the Asia regions and Pacific waters. Although the satellite is equipped with both Ku- and Ka-band frequencies and capable of serving portions of the U.S., Intelsat requests continued authorization only for Ku-band operations with ESAA terminals in foreign territories or over international waters. Operations will continue in the 12.2-12.7 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) Ku-band frequencies.

¹ Intelsat has filed its STA request, FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System.

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02450, File No. SES-STA-20220201-00122 (Mar. 16, 2022) (Public Notice).

³ As that petition will demonstrate, authorization of the JCSAT-1C space station is consistent with the Commission's *DISCO II* policies, as the satellite is licensed by a WTO Member and provides FSS, a service covered by U.S. commitments under the Basic Telecom Agreement. See *generally Amendment of the Commission's Regulatory Policies to Allow Non-U.S.-Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, Report and Order, 12 FCC Rcd 24094 (1997).

Consistent with previously approved applications for authorization involving non-U.S. licensed space stations that do not access the U.S. market,⁴ Intelsat hereby incorporates by reference coverage maps,⁵ a link budget, and a letter confirming coordination between Intelsat and SKY Perfect JSAT Corporation (“JSAT”), the owner of the JCSAT-1C spacecraft. Intelsat also includes an orbital debris mitigation statement prepared by JSAT to demonstrate compliance with the Commission’s orbital debris mitigation rules.

Grant of this STA extension request will serve the public interest by making additional satellite capacity available to meet the growing demand for in-flight connectivity services, including broadband, on U.S. aircraft in Asia or over international waters. This is particularly important as air travel rises again following the slow down caused by the COVID-19 pandemic.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Kerry Murray

⁴ See, e.g., *Policy Branch Information; Actions Taken*, Public Notice, Report No. SES- 02208, File No. SES-LIC-20190603-00713 (Oct. 16, 2019) (licensing SES Americom, Inc. to operate ESAA terminals with foreign-licensed satellites including NSS-12, for operations in Europe, the Middle East, Central and Southern Asia, and East Africa, and SES-12, for operations in Australia, Asia, Africa, and the Middle East); *Policy Branch Information; Actions Taken*, Public Notice, Report No. SES-01911, File No. SES-MFS-20160824-00738 (Dec. 14, 2016) (authorizing AC BidCo LLC to add the Swedish-licensed ASTRA 4A satellite as an authorized point of communication for ESAA operations in Europe).

⁵ See *supra* n 2. Although the coverage maps show that JCSAT-1C is capable of serving portions of the U.S. and its territorial waters, Intelsat confirms that it would limit operators to ESAA terminals operating abroad for purposes of this STA extension request.