

October 19, 2018

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **SKY Perfect JSAT Corporation Written *Ex Parte* Presentation; GN
Docket No. 14-177 and RM 11809**

Dear Ms. Dortch:

SKY Perfect JSAT Corporation (JSAT) is pleased to provide its views to the Federal Communications Commission regarding the above-referenced proceedings in which the Commission is examining the potential introduction of Stratospheric-Based Communications Services (SBCS) into the United States that would operate in the 21.5-23.6 GHz, 25.25-27.5 GHz, 71-76 GHz, and 81-86 GHz radiofrequency bands. JSAT applauds the Commission for making the forward-looking decision to consider giving SBCS access to spectrum and appreciates the challenging spectrum management decisions that will be required to enable SBCS to become reality in the United States. JSAT believes that SBCS can bring many benefits to mobile service and other providers and, ultimately, consumers.

JSAT has been a leader in the converging fields of broadcasting and communications. It is Asia's largest satellite operator with a fleet of 17 satellites, and Japan's only provider of both multi-channel pay TV broadcasting and satellite communications services. JSAT delivers a broad range of entertainment through the SKY PerfecTV! platform, the most extensive in Japan with 3.5 million subscribers. In addition, JSAT's satellite communications services cover Japan and the rest of Asia, as well as Hawaii, parts of the United States, and other points in North America, Oceania, Russia, and the Middle East. These communications services play a vital role in supporting safety, security and convenience for society as a whole.

JSAT has a firm interest in SBCS solutions to complement its already growing communications services in Japan and other regions in which it operates and may expand. SBCS would be an ideal solution for 5G back haul in Japan and elsewhere. The principal advantages that JSAT sees in SBCS solutions are the ability to reach a large coverage area of over 15,000 square kilometres with high-capacity, low-latency communications and networking capabilities with the deployment of a single stratospheric platform. JSAT has studied various methods by which small cell densification in urban areas can be achieved, and firmly believes that SBCS has a key role to play in achieving this important objective. Further, the ability to upgrade an entire large metro area with the switch-over from one or a small number of platforms to their substitutes will enable stratospheric-based solutions to remain state of the art more readily than terrestrial backbone networks.

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As the FCC knows, a number of leading aerospace companies in North America, Europe, and Asia are working on stratospheric platforms and related communications payloads. Interest in making such solutions a reality is greater than ever before, and the technologies to enable such solutions have matured in a way that was not true in the past. For the past 3 years, JSAT has analyzed the planned stratospheric platform, payload, and system designs of a number of enterprises in Europe and the United States that intend to provide stratospheric based solutions. JSAT has spent substantial resources in this preliminary effort, including meetings with a number of the leading companies on several continents. JSAT has analyzed their aircraft and payload designs. JSAT has met with the leadership of Elefante Group, Inc. (Elefante) on a number of occasions, both in Japan and in the United States. JSAT has also met with key personnel and management of Lockheed Martin Corporation (Lockheed Martin) – which is providing Elefante with airship and communications technology solutions as its prime contractor – both at JSAT headquarters in Tokyo and at several of Lockheed Martin's North American facilities, which included the conduct of technical due diligence.

From among the planned systems it has reviewed, JSAT believes that the Elefante/Lockheed Martin approach clearly holds the most feasible and capable promise for realizing a viable platform fleet equipped with advanced communications payloads, including networking capabilities, in the next few years to realize high-capacity, low-latency SBCS services. JSAT is of the view that such services that the Elefante solution will be able to provide will be important for the achievement of next generation networks in an efficient manner. Indeed, the FCC may be interested to know that JSAT is currently in the process of giving serious consideration after own local investigation of the feasibility and market research in Japan to requesting that Japan's Ministry of Internal Affairs and Communications, Telecommunications Bureau, study the process of identifying and designating sufficient spectrum in the millimetre range of frequencies to ensure that Japan, too, can stimulate a timely set of high-capacity, low-latency SBCS solutions like those that the Elefante system would support.

JSAT encourages the FCC to move swiftly and grant the Elefante petition for rulemaking filed in RM 11809 as a stepping stone to adopting rules enabling operation of SBCS. While promptly taking these steps would allow the United States to assume a leadership role in introducing SBCS to the marketplace, such decisions will help further stimulate the timely design, development, and deployment of stratospheric solutions abroad.

As required by Section 1.1206(b) of the Commission's regulations, this letter is being filed with the Secretary's office. It is being filed electronically.

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Respectfully submitted,



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Board Director
Senior Managing Executive Officer
Unit President, Space Business Unit
SKY Perfect JSAT Corporation

cc: Chairman Ajit Pai
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