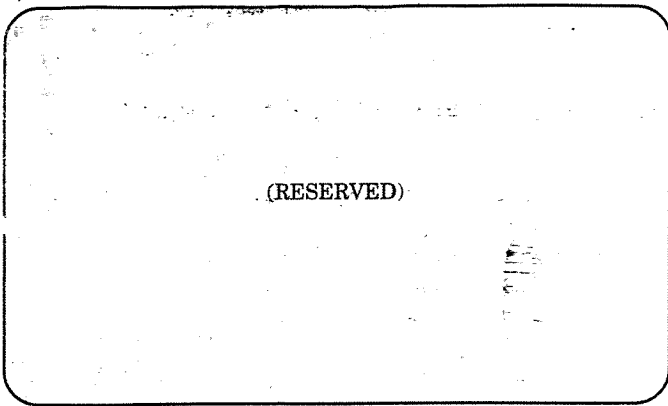


FEDERAL COMMUNICATIONS COMMISSION
FCC REMITTANCE ADVICE

Approved by OMB
 3060-0388
 Expires 2/26/97

PAGE NO. 1 OF



(RESERVED)

(Read instructions carefully BEFORE proceeding.)

SPECIAL USE FCC/MELLON	NOV 03 1995
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FCC USE ONLY	18/19-SAT-P/LA-96 20-SAT-P-96
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PAYOR INFORMATION

(1) FCC ACCOUNT NUMBER 0 1 3 2 8 4 9 9 8 5	Did you have a number prior to this? Enter it.	(2) TOTAL AMOUNT PAID (dollars and cents) \$ 167,725 .00
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(3) PAYOR NAME (If paying by credit card, enter name exactly as it appears on your card)
GE AMERICAN COMMUNICATIONS, INC.

(4) STREET ADDRESS LINE NO. 1
 Four Research Way

(5) STREET ADDRESS LINE NO. 2

(6) CITY Princeton	(7) STATE NJ	(8) ZIP CODE 08540-6684
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(9) DAYTIME TELEPHONE NUMBER (Include area code)	(10) COUNTRY CODE (if not U.S.A.)
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ITEM #1 INFORMATION

(11A) NAME OF APPLICANT, LICENSEE, REGULATEE, OR DEBTOR GE American Communications, Inc.	FCC USE ONLY <i>6990.00 me</i>
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(12A) FCC CALL SIGN/OTHER ID	(13A) ZIP CODE	(14A) PAYMENT TYPE CODE B B Y	(15A) QUANTITY 3	(16A) FEE DUE FOR PAYMENT TYPE CODE IN BLOCK 14 \$ 4,005 <i>2324</i>
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(17A) FCC CODE 1	(18A) FCC CODE 2	<i>167,725.00</i>
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(19A) ADDRESS LINE NO. 1	(20A) ADDRESS LINE NO. 2	(21A) CITY/STATE OR COUNTRY CODE
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ITEM #2 INFORMATION

(11B) NAME OF APPLICANT, LICENSEE, REGULATEE, OR DEBTOR GE American Communications	FCC USE ONLY <i>160720.00 me</i>
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(12B) FCC CALL SIGN/OTHER ID	(13B) ZIP CODE	(14B) PAYMENT TYPE CODE B N Y	(15B) QUANTITY 2	(16B) FEE DUE FOR PAYMENT TYPE CODE IN BLOCK 14 \$ 162,270
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(17B) FCC CODE 1	(18B) FCC CODE 2	<i>30360.44</i>
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(19B) ADDRESS LINE NO. 1	(20B) ADDRESS LINE NO. 2	(21B) CITY/STATE OR COUNTRY CODE
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CREDIT CARD PAYMENT INFORMATION

(22) MASTERCARD/VISA ACCOUNT NUMBER:

Mastercard Visa

EXPIRATION DATE: /

Month Year

(23) I hereby authorize the FCC to charge my VISA or Mastercard for the service(s)/authorization(s) herein describe.

AUTHORIZED SIGNATURE _____ DATE _____



Alexander P. Humphrey, IV
Washington Counsel

General Electric Company,
1750 Old Meadow Road, McLean, VA 22102-4300
703 848-1216 Fx: 703 848-1184

November 2, 1995

Mr. Thomas Tycz, Chief
Satellite & Radio Communications Division
International Bureau
Federal Communications Commission
PO Box 358160
Pittsburgh, PA 1521-5115

Dear Mr. Tycz:

Enclosed herewith for filing is an original and three copies of the application of GE American Communications, Inc. (GE Americom) for a separate international satellite system consisting of two Extended Ku-band communications satellites and one ground spare, together with an executed Form 159 and a check in the appropriate amount. Will you please date-stamp and return to the undersigned the fourth copy.

By copy of this letter to the Secretary, GE Americom is sending financial information associated with this application, with the request that this be kept confidential. Satellite communications are one of the most competitive industries regulated by the industry, and information about the cost of the system and the projected revenues to be earned therefrom would cause significant harm if released to another satellite company.

Respectfully submitted,

Alexander P. Humphrey

Encs.

cc: Mr. William F. Caton, Acting Secretary

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Application of)
)
GE AMERICAN COMMUNICATIONS, INC.)
)
For Authority To Construct, Launch and Operate)
A Separate International Fixed Satellite System of)
Two Extended Ku-band Communications)
Satellites and One Ground Spare Satellite)

**CONSOLIDATED SYSTEM APPLICATION OF
GE AMERICAN COMMUNICATIONS, INC.**

Philip V. Otero
Alexander P. Humphrey
GE American Communications, Inc.
4 Research Way
Princeton, NJ 08540

Summary

In this application GE American Communications, Inc. seeks authorization to construct, launch and operate a separate international satellite system consisting of two Extended Ku-band communications satellites and one ground spare. The satellites, to be known as GE-8, GE-9 and GE-10, will provide GE Americom's customers with affordable state-of-the art satellite services between the U.S. and the rest of the Americas.

GE Americom proposes to operate GE-8 at 85° W.L. and GE-9 at 87° W.L. These orbital positions are essential to allow the satellites to provide optimum coverage of the intended service areas required by customers. GE Americom currently operates domestic spacecraft at these orbital positions, and has applications for replacement satellites pending. GE-10 will be a ground spare available for use to protect the in-orbit spacecraft.

The proposed satellites will operate in the 13.75-14.0 and 11.45-11.7 GHz bands (commonly referred to as the Extended Ku-band). They will be equipped with sixteen 27 MHz 220-watt Ku-band transponders.

Based on GE Americom's extensive experience in Ku-band satellite communications, we expect customers to use the capacity of these Extended Ku-band international satellites in much the same way they have used GE Americom's domestic Ku-band fleet. Most current customers use these transponders to provide digital video services. GE Americom similarly anticipates that GE-8 and GE-9 will be used primarily for video distribution to meet growing demand for more programming service in the Americas. However, the satellites proposed here will be capable of supporting a broad range of international services, and GE Americom will be ready to meet such customer demand.

GE Americom recognizes that the Commission has before it a petition for amendment of the Table of Allocations to permit use of the 13.75-14.0 GHz bands as proposed here. That petition is unopposed, and GE Americom requests that the Commission move expeditiously to complete the change in allocation and grant this application.

The GE Americom separate system will meet the needs of the Western Hemisphere for new services, make an efficient use of the orbital arc, and export United States satellite technology. All of these results serve the public interest.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Application of)
)
GE AMERICAN COMMUNICATIONS, INC.)
)
For Authority To Construct, Launch and Operate)
A Separate International Fixed Satellite System of)
Two Extended Ku-band Communications)
Satellites and One Ground Spare Satellite)

**APPLICATION OF
GE AMERICAN COMMUNICATIONS, INC.**

Introduction

GE American Communications, Inc. (GE Americom) hereby applies for Commission consent to construct, launch and operate a separate international system of two high-power Extended Ku-band satellites, plus a ground spare, to provide service to the Americas. These satellites, to be referred to as GE-8, GE-9 and GE-10, will operate at the 13.75-14.0 GHz and 11.45-11.7 GHz bands. Each spacecraft will have sixteen 27 MHz 220 watt transponders. This configuration will allow GE Americom's customers to use the Extended Ku-band for international video distribution and other services throughout the Western Hemisphere.

As the Commission knows, GE Americom is an experienced satellite operator which launched its first communications satellites twenty years ago and pioneered the use of Ku-band frequencies. GE Americom currently operates a fleet of thirteen satellites. It is committed to meeting its customers' expanded domestic service requirements in the next decade

through replacement and expansion satellites, applications for which are now pending. The instant Application will similarly allow GE Americom to meet customer needs for international capacity to serve the Western Hemisphere.

Name and Address of Applicant

The name of the applicant is GE American Communications, Inc. (GE Americom).

All correspondence and other communications concerning this Application should be directed to:

Philip V. Otero
Vice-President and General Counsel
GE American Communications, Inc.
4 Research Way
Princeton, NJ 08540
(609) 987-4000

Description of Satellites

Details of the proposed satellites are set forth in the attached Technical Appendix.

The spacecraft are capable of being launched by currently available launch vehicles. Once launched, the satellites will be maintained in geosynchronous orbit with tolerances of $\pm 0.05^\circ$ both in north-south and east-west directions. The satellites will have a design life of fifteen years.

The satellites will transmit signals in the 11.45-11.7 GHz band and will receive transmissions in the 13.75-14.0 GHz band. The receive frequency was allocated by WARC-92 for fixed-satellite uplinks in Region 2, subject to certain technical requirements that will be followed here. This application assumes that the Commission will amend the U.S. Table of Allocations and make corresponding changes to its Rules to permit use of the 13.75 - 14.0 GHz Extended Ku-band for international FSS service. ^{1/} GE Americom respectfully urges the

^{1/} See Petition for Rulemaking of Hughes Communications Galaxy, Inc., RM No. 8638, *Public Notice* Report No. 2070, released May 3, 1995. We do not anticipate that the issues under discussion at the 1995 ITU World Radiocommunication Conference concerning the

Commission to act expeditiously to approve this change. No party opposed the request, and another application already is pending from Hughes Communications Galaxy, Inc. (Hughes) to operate in the Extended Ku-band. ^{2/} GE Americom suggests that the Commission place the instant Application on public notice promptly, and grant the Application at the same time that it amends the Table of Allocations. This procedure would be the most efficient and would expedite new service to the public.

The planned missions of GE-8 and GE-9 are to provide service between the U.S. and the Americas. GE American proposes to locate these satellites at 85° W.L. and 87° W.L., respectively. At these positions, GE-8 and GE-9 can provide service to Mexico, the Caribbean, Central America and South America (referred to collectively herein as Latin America).

GE Americom will provide TT&C for these satellites using existing facilities located in Vernon Valley, New Jersey, and South Mountain, California. These earth stations are currently used to control GE Americom's fleet of 13 satellites. GE Americom will separately apply for Commission authority to modify those stations to provide the necessary services for GE-8 and GE-9.

It is anticipated that transmit-receive and receive-only earth stations that will interoperate with these satellites in the U.S. and Latin America will be owned by end-users or cable systems and will be licensed in accordance with the laws of the countries in which they are

Extended Ku-band should affect operation of GE-8 and GE-9. *See Report*, Preparation for WRC-95, IC Docket No. 94-31, FCC 95-256 at ¶¶ 81-83, released June 15, 1995. In any event, GE Americom will take appropriate steps to protect space research and other services that share the 13.75 - 14.0 GHz band.

^{2/} Hughes has applied to operate the Galaxy VIII(I) satellite in the Extended Ku-band in File No. 47-DSS-P/LA-94, CSS-94-018.

located. GE Americom believes that the size of the receive-only antennas will be very small, substantially below one meter in some cases. DTH antennas will be distributed on the premises of households in generally uncabled areas, while cable head end antennas primarily will be located in or near major cities. Earth stations for other services will be distributed to meet customer needs. At this point, it is impossible to determine the number of international antennas that will be oriented to the satellites, but services on GE Americom's present domestic Ku-band fleet transmit to hundreds of thousands of households.

While the Commission has not yet proposed service rules for the use of the Extended Ku-band, the attached Technical Appendix shows that the proposed satellites are capable of operating within two degrees of an adjacent satellite using identical frequencies.

APPROVAL OF THE PROPOSED SATELLITES WOULD BE IN THE PUBLIC INTEREST

Extension of GE Americom's services to Latin America will strongly serve the public interest by fostering the development of new markets for GE Americom's customers. Many of these customers now use GE Americom's domestic Ku-band satellite fleet to distribute video programming and voice and data services to small antennas throughout the United States. In the future these customers will require international satellite capacity as they globalize their communications activities. The Commission is familiar with worldwide trends for U.S. entertainment and other companies to pioneer new international markets eager for video services. International satellite capacity also is needed for non-video services.

A. Authorization of the Satellites Would Allow Customers to Expand to New Markets

The satellites proposed in this Application will permit GE Americom customers and other companies to serve new markets abroad. Currently international satellite capacity is insufficient to meet customer needs, especially taking into account explosive growth in international communications. The proposed Extended Ku-band satellites would allow GE Americom to meet customer needs in a spectrally efficient manner.

GE Americom's Ku-band satellites have traditionally provided opportunities for video programmers to distribute their programming to cable head ends and on a DTH basis. With their higher transponder powers, GE-8 and GE-9 will be able to provide these services with greater system margins to the Americas. Video transmissions can be uplinked from the United States or Latin America and downlinked in either of those regions, depending upon customer preferences.

In the U.S., satellite-distributed video programming has grown from its infancy to become a thriving industry in two decades. This growth has dramatically expanded the number and range of television channels available to viewers. The expansion of the capacity of cable systems to millions of households made possible by technological developments, and the successful expansion of DTH services to millions more, together have stimulated substantial demand for additional programming. For instance, GE Americom's Satcom K-1 delivers over 70 channels of compressed digital video on a DTH basis to hundreds of thousands of households, in competition with cable and high-power BSS satellites.

We expect a significant use of GE Americom's proposed services in Latin America will be for delivery of DTH video programming. Cable has had little penetration in Latin America

outside of major cities, creating a large requirement for satellite delivery of programming to end users on a DTH basis. Additional international capacity is needed to meet the needs of customers who plan to distribute programming to this market.

Parts of Latin America are within the coverage area of GE Americom's existing three cable satellites, as well as those of other operators. Consequently, a substantial amount of C-band video service is currently received and distributed in those parts of Latin America. This has stimulated demand for additional services. However, because Latin America is at the outer limits of the coverage of these satellites, reception of C-band programming requires expensive and unwieldy high-gain antennas, which has dampened its growth.

GE Americom believes that there are very large populations in Latin America eager to receive more video programming, and smaller inexpensive Extended Ku-band antennas permissible by GE-8 and GE-9 will improve the availability and affordability of this programming. The use of 220-watt transponders will further reduce the size of antennas and their cost, putting them within reach of a substantially greater number of residents within Latin America and adding to the pressure for more programming and more satellite capacity.

The Extended Ku-band system also will be used for non-video applications. Here too customer demand for international satellite communications within the Americas is growing faster than supply. GE-8 and GE-9 will satisfy some of the exploding demand for these voice and data services.

B. Other Public Interest Reasons Support the Proposed Satellites

GE Americom's proposed Extended Ku-band separate international system also will serve the important public interest goal of increasing competition in major markets. Currently international satellite service is provided between the United States and Latin America by Intelsat,

PanAmSat, Columbia and Orion, and similar service has been proposed by Hughes. These firms recognize the large requirement for video and other services in Latin America. Intelsat, PanAmSat and Hughes all hope to tap this demand with high-power Ku-band satellites of their own. GE Americom's Extended Ku-band system will bring additional competition to this rapidly expanding market.

The Commission can draw the lesson from its domestic experience that authorization of additional satellites produces such pro-consumer developments as new services, affordable rates, and technical innovation. The same salutary results have been observed from competition in international markets. GE Americom's participation in the separate system market will increase competition through additional capacity and new technology to meet customer needs.

GE Americom's provision of this new service also will promote other important U.S. interests. It will contribute, for example, together with other U.S. satellites in these markets, to the global information infrastructure and will allow the U.S. to maintain its leadership role in satellite technology. Furthermore, GE Americom's satellite separate system activity will create new markets for U.S. satellite technology, which is the finest in the world.

Just recently, the Commission allowed Hughes Communications Galaxy to install switches on the Ku-band transponders of its Galaxy III(H) satellite in order to provide optional service to its customers in the Caribbean and Latin America. *Hughes Communications Galaxy, Inc.*, Order DA-1906 (Int'l Bur., released September 1, 1995). What the Commission said in that decision is directly relevant here:

We believe that Hughes's proposed modification of Galaxy III(H), to provide service to Latin America, will foster the development of new markets for United

States video programmers and increase competition with respect to the provision of international services. *Id.* at ¶ 5.

The very same considerations apply to this Application.

The high power operations that GE Americom proposes here are consistent with Commission policy. The Commission has routinely authorized increases in transponder power where, as here, there will be no harmful interference to transponders on adjacent satellites. In addition, the Commission has on at least two occasions permitted the installation of technology that allows satellite operators to provide their customers with twice the nominal transponder power, subject to the requirement that the operator avoid harmful interference. *AT&T Corp.*, 5 FCC Rcd 5590, at ¶¶ 9-13 (Comm. Car. Bur. 1990) (modification of Telstar 401, 402, and 403); *AT&T Corp.*, Order DA 95-1972 ¶¶ 3-7 and n.7 (Int'l. Bur., released September 15, 1995) (modification of Telstar 402R).

C. Compliance with INTELSAT Article XIV Obligations

The GE Americom separate international satellite system will need to be coordinated with Intelsat. However, insofar as the primary services to be offered over the satellites will be video program distribution that is not interconnected with the public switched network, current Intelsat procedures assume no economic harm. To the extent that GE Americom may offer international interconnected services, it will not exceed the maximum number of circuits permitted by the Commission. *See, e.g., Alpha Lyracom*, 9 FCC Rcd 1282 (Comm. Car. Bur. 1994). That limitation is scheduled to be lifted in January 1997, at which time the spacecraft still will be under construction. GE Americom will also secure appropriate authorizations from Latin American telecommunications authorities, and will work with the staff of the International Bureau to register the satellites with the ITU.

Construction and Launch Schedules

First Satellite

Construction Commenced -- 2 months after authorization
Construction Completed -- 32 months after authorization
Spacecraft Launched -- 34 months after authorization
Spacecraft in Service -- 36 months after authorization

Second Satellite

Construction Commenced -- 11 months after authorization
Construction Completed -- 41 months after authorization
Spacecraft Launched -- 43 months after authorization
Spacecraft in Service -- 46 months after authorization

Ground Spare

Construction Commenced -- 20 months after authorization
Construction Completed -- 50 months after authorization

Satellite Utilization

GE Americom does not currently operate separate international satellites. This new Extended Ku-Band system represents GE Americom's first step to deploy such satellite capacity. ^{3/} As discussed above, our customers have strong and growing requirements for satellite services within the Americas. Based on the anticipated demand resulting from GE-8 and GE-9 coverage areas and power enhancements, GE Americom projects a high degree of utilization of these spacecraft. ^{4/}

^{3/} The "Extended Ku-band" is distinct from conventional Ku-band frequencies used for domestic fixed satellite service and is subject to different regulatory and technical considerations. Thus, it is a separate frequency band and this application falls under Section 25.140(f) of the Commission's rules.

^{4/} GE Americom's present fleet of C-band, Ku-band and hybrid C/Ku-band satellites have been essentially filled since 1990. This is shown by GE Americom's periodic reports to the Commission.

Non-Common Carrier Operations

GE Americom intends to offer capacity on its proposed separate international satellite system on a private, non-common carrier basis, pursuant to the Commission's decision in *Domestic Fixed-Satellite Transponder Sales*, 90 FCC 2d 1238 (1982), *aff'd. sub nom. Wold Communications, Inc. v. FCC*, 735 F.2d 1465 (D.C. Cir. 1984). Consistent with the *Separate Systems* policy, transponders on GE-8 and GE-9 will be sold or made subject to long-term leases to GE Americom's customers.

Licensee Qualifications

GE Americom is a wholly-owned subsidiary of General Electric Company. GE Americom has been a pioneer in satellite communications, having launched its first satellite system in 1975, and now provides service to its customers on a thirteen-satellite fleet of C-band, Ku-band and hybrid C/Ku-band spacecraft. The Commission has routinely approved GE Americom's legal, technical and financial qualifications to construct, launch and operate domestic satellite systems on numerous occasions. For example, the Commission staff recently said that GE Americom's legal, technical and financial "qualifications as a satellite operator are a matter of record" *Contel Corp.*, 9 FCC Rcd 5775, 5776 (Com.Carr.Bur. 1994). A copy of GE Americom's Form 430, setting forth its basic licensee qualifications, is on file with the Commission. We are also attaching the most recent annual report of General Electric Company as Appendix B.

Financial Information

Investment and operating costs, estimated annual revenue requirements, and sources and amounts of estimated revenue from GE Americom's proposed fleet are being

submitted under separate cover to the Commission's staff. Because this information is competitively sensitive, GE Americom requests that it be withheld from access by the public. 5/

Section 304 Waiver

GE Americom hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise.

Certifications

The undersigned hereby certifies individually that the statements made in this Application are true, complete, and correct to the best of his knowledge and belief and are made in good faith. The undersigned also hereby certifies under penalty of perjury that neither the applicant nor any party to this Application is subject to a denial of federal benefits by federal or state courts under authority granted in 21 U.S.C. § 862(a).

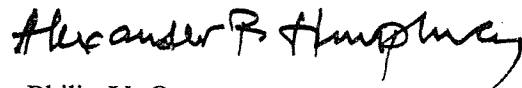
Conclusion

Approval of the satellites that GE Americom proposes in this Application will allow it to provide important new services to growing international markets. Addition of GE Americom to these markets will allow an experienced, successful and financially sound satellite operator to leverage its experience in developing domestic markets to serve its customers' international needs and intensify competition in international markets. Approval of the satellites proposed here will allow customers to create and expand markets, increase competition, and help export of United States communications technology.

5/ This method of submitting confidential data was recently approved in *AT&T Corp.*, Order and Authorization, File No. 118-SAT-LA-95, DA 95-1972, at ¶ 2 and n.3 (released September 15, 1995).

WHEREFORE, GE Americom requests that the Commission authorize the construction, launch and operation of its proposed GE-8 and GE-9 satellites, and construction of GE-10 as a ground spare, in accordance with this Application and the attached individual satellite applications.

Respectfully submitted,



Philip V. Otero
Alexander P. Humphrey
GE American Communications, Inc.
4 Research Way
Princeton, N.J. 08540

Dated: November 2, 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

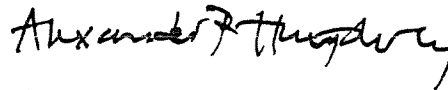
Application of)
)
GE AMERICAN COMMUNICATIONS, INC.)
)
For Authority to Construct an Extended)
Ku-Band Separate International Fixed Satellite)
Service Space Station to Serve as a Ground Spare)

APPLICATION OF
GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. (GE Americom) hereby applies for authority to construct an international Fixed Satellite Service space station that will serve as a ground spare for operation in the 13.75-14.0 GHz/11.45-11.7 GHz band. All required information is included in the foregoing application to which this is attached, which information is incorporated herein by reference.

GE Americom requests that the Commission grant this application.

Respectfully submitted,



Philip V. Otero
Alexander P. Humphrey
GE American Communications, Inc.
4 Research Way
Princeton, N.J. 08540

Dated: November 2, 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

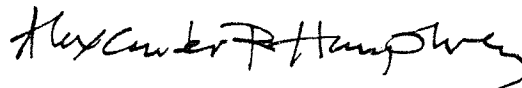
Application of)
)
GE AMERICAN COMMUNICATIONS, INC.)
)
For Authority to Construct, Launch and Operate)
an Extended Ku-Band Separate International)
Fixed Satellite Service Space Station For)
Operation at 85° W.L.)

APPLICATION OF
GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. (GE Americom) hereby applies for authority to construct, launch and operate an international Fixed Satellite Service space station that will operate in the 13.75-14.0 GHz/11.45-11.7 GHz band at 85° W.L. All required information is included in the foregoing application to which this is attached, which information is incorporated herein by reference.

GE Americom requests that the Commission grant this application.

Respectfully submitted,



Philip V. Otero
Alexander P. Humphrey
GE American Communications, Inc.
4 Research Way
Princeton, N.J. 08540

Dated: November 2, 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

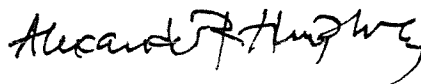
Application of)
)
GE AMERICAN COMMUNICATIONS, INC.)
)
For Authority to Construct, Launch and Operate)
an Extended Ku-Band Separate International Fixed)
Service Space Station For Operation at 87° W.L.)

APPLICATION OF
GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. (GE Americom) hereby applies for authority to construct, launch and operate an international Fixed Satellite Service space station that will operate in the 13.75-14.0 GHz/11.45-11.7 GHz band at 87° W.L. All required information is included in the foregoing application to which this is attached, which information is incorporated herein by reference.

GE Americom requests that the Commission grant this application.

Respectfully submitted,

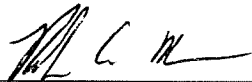


Philip V. Otero
Alexander P. Humphrey
GE American Communications, Inc.
4 Research Way
Princeton, N.J. 08540

Dated: November 2 1995

CERTIFICATION OF PERSON RESPONSIBLE
FOR PREPARING TECHNICAL INFORMATION
CONTAINED IN THIS APPLICATION

I hereby certify under penalty of perjury that I am the technically qualified person responsible for preparation of the technical information contained in this Application; that I am familiar with the technical requirements of Part 25; and that I either prepared or reviewed the technical information contained in this application and that it is complete and accurate to the best of my knowledge.



Robert G. Nelson
Manager, Advanced Programs
GE American Communications, Inc.

Dated: November 2, 1995