

NBCUniversal

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January 16, 2014

FILED ELECTRONICALLY

Ms. Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Written *Ex Parte* Presentation:
SES Americom, Inc. Application for the SES-3 C/Ku-Band Replacement Satellite,
File Nos. SAT-RPL-20121228-00227 & SAT-AMD-20131113-00132, Call Sign
S2892**

Dear Ms. De La Torre:

NBCUniversal Media, LLC ("NBCUniversal") urges the International Bureau to expeditiously grant the long-pending request of SES Americom, Inc. ("SES") for an operating license for the in-orbit SES-3 C- and Ku-band replacement satellite at the 103° W.L. orbital location. Prompt grant is needed to allow NBCUniversal and other customers of SES capacity at this orbital position to begin what will be an unusually lengthy and complex transition and to minimize any risk of disruption to key services. As the Commission is aware, NBCUniversal produces and distributes news, public interest, sports and entertainment programming throughout the United States and around the globe. In the U.S., this programming is available to virtually every viewing household – urban, suburban, or rural – including the many households that rely on over-the-air television distribution rather than subscribing to a paid service.

Satellite capacity provided by SES on its AMC-1 spacecraft at 103° W.L. is an essential part of the infrastructure NBCUniversal uses to both collect and distribute programming. On the collection side, NBCUniversal uses AMC-1's Ku-band capacity for satellite news gathering necessary to cover the late-breaking news and information on which U.S. households depend. On the distribution side, NBCUniversal's NBC Network uses the

AMC-1 Ku-band payload to deliver programming to NBC-affiliated television stations throughout the U.S.

Because AMC-1 is aging, NBCUniversal needs to transfer these important services to SES-3 – the state-of-the art follow-on satellite that SES has placed into position at 103° W.L. This transition must take place in an orderly way, well before AMC-1 approaches its projected end-of-life. The transition in this case will be especially challenging because the SES-3 Ku-band payload differs in one significant aspect from the Ku-band payload on AMC-1. Specifically, AMC-1 has an atypical polarization orientation in the Ku-band: its polarization is offset by 26 degrees from the usual horizontal/vertical setting. SES-3, on the other hand, uses standard horizontal and vertical polarization in the Ku-band.

As a result, moving Ku-band traffic from AMC-1 to SES-3 will be much more time-consuming and intricate than the typical shift of services to a replacement satellite. The Ku-band antennas throughout the widely dispersed facilities network used by NBCUniversal will need to be individually programmed and tested to reflect the polarization change. This requires truck rolls to dispatch trained personnel to each of approximately 200 earth station locations across the nation that use Ku-band capacity at 103° W.L. This work can only begin after SES-3 is authorized by the Commission, as NBCUniversal must be able to receive the appropriately polarized Ku-band beacon on SES-3 in order to program and test the necessary antenna adjustments. Only after all antennas have been properly programmed and tested for the polarization change can NBCUniversal begin to transfer its traffic from AMC-1 to SES-3.

Unlike the routine switchover to a replacement satellite that can occur in a few weeks, NBCUniversal estimates that the transition from AMC-1 to SES-3 will take a period of roughly six months. Moreover, NBCUniversal needs sufficient lead time in advance of the switchover to make all the logistical arrangements for these site visits in order to ensure the availability of necessary staff, equipment, and other resources.

The precise time frame in which the transition can occur is also extremely limited. NBCUniversal must schedule the traffic transfer around significant programming events – particularly real-time sports coverage – so as to avoid the possibility of disrupting service to viewers. Specifically, NBC needs to effect this transition beginning in late February 2014, following the end of the Sochi Winter Olympics, and complete it prior to the beginning of the NFL season in late August 2014.

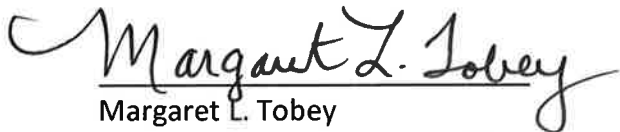
Given these constraints, time is of the essence. SES has advised NBCUniversal that SES-3 is ready to begin providing Ku-band service as soon as the necessary Commission authorization is received. NBCUniversal accordingly requests that the Commission act

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as quickly as possible to approve the SES-3 application. Grant of the application will promote the Commission's core objective of ensuring service continuity for the millions of viewers of NBCUniversal's programming by facilitating the orderly transition of traffic from AMC-1 to SES-3.

Please address any questions or correspondence regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in cursive script, reading "Margaret L. Tobey". The signature is written in dark ink and is positioned above the printed name.

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cc: Diane Cornell, Special Counsel to Chairman Wheeler
Louis Peraertz, Legal Advisor to Commissioner Clyburn
David Goldman, Senior Legal Advisor to Commissioner Rosenworcel
Jeffrey Neumann, Legal Advisor to Commissioner Pai
Erin McGrath, Legal Advisor to Commissioner O'Rielly
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