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FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Application to Operate SES-3, Call Sign S2892
File Nos. SAT-RPL-20121228-00227 & SAT-AMD-20131113-00132**

Dear Ms. Dortch:

SES Americom, Inc. ("SES"), by its attorney, hereby supplements the record relating to the above-referenced application for a Commission license to operate the SES-3 C-/Ku-band replacement satellite (the "SES-3 Application") pursuant to Sections 1.65 and 1.1206 of the Commission's rules, 47 C.F.R. §§ 1.65 & 1.1206.

Specifically, SES advises the Commission that DISH Operating L.L.C. ("DISH") has filed an application requesting Commission authorization for U.S. earth stations to communicate with the Ciel-6i payload aboard SES-3.¹ Now that this market access filing for the Ciel-6i payload is pending, SES reiterates its request that the Commission promptly consider and grant the SES-3 Application, consistent with Commission precedent. Grant of SES-3 replacement authority will serve the public interest by providing state-of-the-art follow-on capacity for the many existing C- and Ku-band customers being served today by the aging AMC-1 satellite at 103° W.L.

In addition, SES asks the Commission to update its records regarding SES-3 to reflect revised technical information provided in the DISH Request regarding the Ciel-6i payload, as set forth below.

Background. The SES-3 Application requests authority to operate the spacecraft's C- and Ku-band payloads at 103° W.L. in order to provide service continuity to U.S. customers currently using the AMC-1 spacecraft at that location. SES-3 also carries a Canadian-licensed payload known as Ciel-6i operating in the 17/24 GHz Broadcasting-Satellite Service ("BSS") frequencies. As its application made clear, SES is not seeking U.S. market access for the Ciel-6i payload, and SES provided technical data regarding that payload for information purposes only.² The SES-3 Application was filed in December 2012 and remains pending despite the strong public interest in ensuring service continuity for customers.

¹ DISH Operating L.L.C., File No. SES-LFS-20140924-00752 (the "DISH Request").

² SES-3 Application, Narrative at 1 n.1.

DISH Request. The submission of the DISH Request for U.S. market access removes any possible justification for further delay in granting the requested C- and Ku-band license for SES-3. The International Bureau's stated rationale for deferring action on C- and Ku-band replacement authority for SES-3 was "to provide a period" of time for the 17/24 GHz BSS frequencies to be coordinated.³ But as SES has repeatedly observed, the appropriate context for the Commission to consider any issues relating to the Ciel-6i 17/24 GHz BSS payload is in a market access proceeding relating to that band – not in the SES-3 C/Ku-band replacement proceeding.⁴ Now that such a market access request is on file, it provides a clear avenue for addressing these matters, and the Commission has no reason to continue to withhold C- and Ku-band authority for SES-3. No deficiency has been identified in SES's request for C- and Ku-band follow-on capacity, nor has the public interest in replacing AMC-1 been questioned. Accordingly, the Commission should promptly grant the SES-3 Application.

Updates to Ciel-6i Description. The DISH Request also includes technical data that corrects and supersedes information regarding the Ciel-6i payload that was provided in the SES-3 Application. Specifically, the DISH Request reflects the following changes:

- Revised analysis pursuant to Section 25.264 of the Commission's rules of the payload's off-axis gain and power flux density based on a corrected value for ϕ .⁵
- Revised channel plan in items S.9 and S.10 of the Schedule S for the single 500 MHz 17/24 GHz BSS transponder on Ciel-6i.
- Updated four-degree spacing analysis in Section A.9 of the Technical Annex and updated link budgets in Schedule S based on different typical carriers that are more representative of DISH's proposed use of the payload.
- Slightly revised uplink power levels in Section A.7 of the Technical Annex to account for closer spacing of the proposed DIRECTV 17/24 GHz BSS satellite at 99.235° W.L.
- Slightly revised worst-case power flux density calculation in Section A.8 of the Technical Annex that continues to show compliance with Section 25.208(w) of the Commission's rules.
- Updated TT&C earth station sites for the SES-3 satellite in item S.14 of the Schedule S.

SES hereby incorporates by reference in the SES-3 proceeding the technical description of the Ciel-6i payload in the DISH Request that includes these updates.

³ *SES Americom, Inc.*, 29 FCC Rcd 3678, 3678, ¶ 1 (IB 2014). As SES has made clear, it strongly disagrees that this is a valid basis for the Bureau's decision given Commission precedent rejecting requests for deferral based on outstanding coordination issues, even when they involved the frequency band at issue in the proceeding. See *Petition to Deny of SES Americom, Inc. and Ciel Satellite Limited Partnership*, File Nos. SAT-MOD-20140612-00066 & SAT-MOD-20140624-00075, filed Sept. 2, 2014 at 22 & n.60.

⁴ See, e.g., *Opposition of SES Americom, Inc.*, File Nos. SAT-RPL-20121228-00227 & SAT-AMD-20131113-00132, filed Dec. 24, 2013 at 12.

⁵ DISH Request, Attachment A, Technical Annex to Supplement Schedule S, Section A.12 at 10-15.

For the foregoing reasons, SES requests expedited grant of the long-pending SES-3 Application to allow SES to make efficient use of its investment in satellite capacity in order to meet its customers' requirements for service continuity.

Please contact the undersigned if you have any questions.

Respectfully submitted,

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