

SatCom Law LLC 1317 F St. NW, Suite 400 Washington, D.C. 20004 T 202.599.0975 www.satcomlaw.com

November 20, 2014

## FILED ELECTRONICALLY

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

Re: Notice of *Ex Parte* Presentation, IBFS File Nos. SAT-RPL-20121228-00227 & SAT-AMD-20131113-00132, Call Sign S2892

Dear Ms. Dortch:

On November 18, 2014, representatives of SES met with Commissioner Jessica Rosenworcel and David Goldman, Senior Legal Advisor to Commissioner Rosenworcel, to discuss the above-referenced application for the SES-3 C- and Ku-band replacement satellite. The SES representatives present were Karim Michel Sabbagh, President & CEO; Gerald E. Oberst, Senior Vice President, Global Regulatory & Governmental Strategy; Elias Zaccack, Senior Vice President, Commercial Americas; and the undersigned outside counsel to the company.

The purpose of the meeting was to seek expedited grant of full C- and Ku-band replacement authority for SES-3. SES argued that the International Bureau's withholding of such authority pending resolution of coordination issues involving a different band is improper and contrary to Commission precedent. As a result of the Bureau's action, SES has been required to maintain both SES-3 and AMC-1 at the 103° W.L. location, preventing the company from relocating AMC-1 to introduce additional services and from using SES-3 to meet new government and commercial customers' demand for capacity. Existing customers at this orbital location have also been harmed because their plans for transitioning to the new satellite have been disrupted, and they continue to bear the risk that a problem could arise with AMC-1 while the SES-3 application remains pending.

SES noted that a U.S. market access request for the Canadian-licensed 17/24 GHz payload on SES-3 is pending, providing the Commission with an appropriate avenue to address coordination issues relating to that band without threatening service continuity for C/Ku-band customers. Accordingly, SES urged the Commission to de-link the SES-3 C/Ku-band application from the outstanding 17/24 GHz coordination and promptly grant the long-pending SES-3 application.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Karis A. Hastings

Karis A. Hastings Counsel for SES karis@satcomlaw.com

## Attachment

cc: Commissioner Jessica Rosenworcel Daw William Wiltshire, Counsel for DIRECTV Ma

David Goldman Margaret Tobey, VP, NBCUniversal