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November 26, 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* Presentations, IBFS File Nos. SAT-RPL-20121228-00227  
& SAT-AMD-20131113-00132, Call Sign S2892**

Dear Ms. Dortch:

On November 24, 2014, representatives of SES met to discuss the above-referenced application for the SES-3 C- and Ku-band replacement satellite with:

- Commissioner Ajit Pai and Brendan Carr, Legal Advisor to Commissioner Pai
- Diane Cornell, Special Counsel to Chairman Tom Wheeler
- Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn
- Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly
- Mindel De La Torre, International Bureau Chief; Troy Tanner, International Bureau Deputy Chief; Robert Nelson, International Bureau Chief Engineer; Jose Albuquerque, Satellite Division Chief; Karl Kensinger, Satellite Division Deputy Chief; and Chip Fleming, Satellite Division Chief Engineer

The SES representatives present at these meetings were Gerald E. Oberst, Senior Vice President, Global Regulatory & Governmental Strategy; Daniel C.H. Mah, Regulatory Counsel; and the undersigned outside counsel to the company.

The purpose of the meetings was to seek grant without further delay 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. In particular, the Bureau ignored the strong public interest in service continuity that is embodied in the Commission's long-standing satellite replacement expectancy policy. 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. 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*

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Attachment

cc: Commissioner Ajit Pai  
Diane Cornell  
Erin McGrath  
Troy Tanner  
Jose Albuquerque  
Chip Fleming  
Margaret Tobey, VP, NBCUniversal

Brendan Carr  
Louis Peraertz  
Mindel De La Torre  
Robert Nelson  
Karl Kensinger  
William Wiltshire, Counsel for DIRECTV