

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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-AMD-_____
	)	Call Sign S2713
Amendment to Application for Modification of	)	
AMC-18 Fixed-Satellite Space Station License	)	

**AMENDMENT OF SES AMERICOM, INC.**

SES Americom, Inc. (“SES”) hereby amends its pending application for modification of its license for the AMC-18 fixed-satellite space station<sup>1</sup> by updating the timing for relocating the satellite from 139° W.L. to 83° W.L. SES now plans to move the satellite starting on October 16, 2020, rather than July 16, 2020. SES certifies that apart from the matters addressed herein, no change is proposed to the information previously provided with respect to AMC-18. Grant of the modification as amended will serve the public interest by allowing SES to meet evolving customer demand for C-band capacity at 83° W.L.

**AMENDMENT**

AMC-18 is a U.S.-licensed C-band satellite that currently operates at 139° W.L. In the AMC-18 Modification and AMC-18 STA Request, SES sought authority to relocate AMC-18 from 139° W.L. to 83° W.L. in order to satisfy customer demand for C-band capacity at 83° W.L. SES explained in those submissions that the AMC-18 move was related to its previously filed modification application and STA request to relocate the AMC-6 space station

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<sup>1</sup> SES Americom, Inc., Call Sign S2713, File No. SAT-MOD-20200615-00074 (“AMC-18 Modification”); *see also* SES Americom, Inc., Call Sign S2713, File No. SAT-STA-20200615-00075 (“AMC-18 STA Request”).

from 83° W.L. to 139° W.L.<sup>2</sup> The original timing described in these filings contemplated that AMC-6 would begin moving from 83° W.L. to 139° W.L. on or about June 18, 2020. Then, after SES transferred traffic from AMC-18 to AMC-6, the AMC-18 spacecraft would begin drifting on about July 16 and arrive at 83° W.L. in late August.

Developments after the AMC-6 Modification was filed required SES to re-evaluate this timing. Specifically, SES was unable to arrange for an AMC-6 customer's traffic to be transitioned off AMC-6 in time to meet the original schedule, and that customer did not vacate the spacecraft until June 30. As a result, the schedule was revised to delay the start of the AMC-6 relocation, which affected the AMC-18 drift schedule given SES's desire to avoid performing relocations during the eclipse season, which begins in late August. The AMC-6 spacecraft did not begin drifting towards 139° W.L. until July 1, and AMC-6 is now expected to arrive at that location on August 23. AMC-18's proposed drift start date has been delayed until October 16, after the eclipse season ends, and the satellite is now scheduled to arrive at 83° W.L. in early December.

SES could have completed the relocation of both AMC-6 and AMC-18 prior to the beginning of the eclipse season only by significantly accelerating the drift of both satellites. However, the faster drift rate required to meet such a compressed timeline would have expended significantly more fuel and reduced the life expectancy of AMC-6, which is already contracted out to customers until its expected end of life at the end of 2026. The modified schedule will allow SES to avoid drifting AMC-18 during the eclipse season and enable AMC-6 to maintain its current expected end of life.

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<sup>2</sup> See SES Americom, Inc., Call Sign S2347, File Nos. SAT-MOD-20200605-00066 (“AMC-6 Modification”), grant-stamped Aug. 6, 2020, & SAT-STA-20200605-00067.

Grant of the requested authority to relocate AMC-18 pursuant to this updated schedule will serve the public interest and is consistent with Commission precedent. The Commission has repeatedly observed that its policy is to allow “satellite operators to rearrange satellites in their fleet to reflect business and customer considerations where no public interest factors are adversely affected.”<sup>3</sup> As the International Bureau has explained:

the Commission attempts, when possible, to leave spacecraft design decisions to the space station licensee because the licensee is in a better position to determine how to tailor its system to meet the particular needs of its customers. Consequently the Commission will generally grant a licensee’s request to modify its system, provided there are no compelling countervailing public interest considerations.<sup>4</sup>

Here, the proposed change would enable SES to make efficient use of AMC-18 to meet customer demand for C-band service at 83° W.L. The delayed relocation of AMC-18 to 83° W.L. will not affect customer service. SES transitioned all traffic off of AMC-6 before it left 83° W.L., and the new customer that will be using AMC-18 capacity at 83° W.L. is not scheduled to commence operations with the spacecraft until after the revised date for AMC-18 to arrive at that location. SES remains committed to providing C-band space segment at 83° W.L., and the schedule delay will allow SES needed flexibility in managing its fleet but will not adversely affect any other parties.

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<sup>3</sup> *SES Americom, Inc.*, Order and Authorization, DA 06-757 (IB rel. Apr. 7, 2006) at 4, ¶ 8, *citing Amendment of the Commission’s Space Station Licensing Rules and Policies*, Second Report and Order, 18 FCC Rcd 12507, 12509, ¶ 7 (2003).

<sup>4</sup> *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316, 12318, ¶ 8 (IB 1998) (footnote omitted).

For the foregoing reasons, SES amends the AMC-18 Modification and seeks prompt action on the modification as amended to permit SES to relocate the satellite to 83° W.L. beginning on October 16, 2020.

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Petra A. Vorwig

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