

# HOGAN & HARTSON

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SEP - 4 2008

Federal Communications Commission  
Office of the Secretary

September 4, 2008

BY HAND DELIVERY

FILE STAMP COPY

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

RE: **SES Americom, Inc. and SES Satellites (Gibraltar) Ltd.;**  
**File No. SAT-ASG-20080609-00120, granted August 6, 2008**  
**Call Sign S2676**

Dear Ms. Dortch:

SES Americom, Inc. ("SES Americom") and SES Satellites (Gibraltar) Ltd. ("SES Gibraltar," and together with SES Americom, the "Parties"), by their attorneys, hereby request a 30-day extension of time to satisfy the condition specified in paragraph 2 of the grant of the above-referenced application relating to the AMC-21 satellite. The requested extension will facilitate the Parties' ability to demonstrate compliance with the condition with minimal administrative burden.

In the underlying application, the Parties explained that although the Commission had originally licensed SES Americom to launch and operate AMC-21, the Parties proposed instead to launch and operate the satellite pursuant to a license granted to SES Gibraltar by the Gibraltar Regulatory Authority. Accordingly, the application requested that authority to serve the U.S. using AMC-21 be assigned from SES Americom to SES Gibraltar and that AMC-21 be added to the Permitted Space Station List to allow U.S.-licensed earth stations to communicate with it as a foreign-licensed satellite.

The Commission granted the application with conditions on August 6.<sup>1</sup> Paragraph 2 of the conditions of the grant addresses bond matters relating to AMC-21. Specifically, the paragraph provides that:

Within 30 days of grant of this assignment, SES Satellites (Gibraltar) Ltd. must furnish either: (1) an

<sup>1</sup> See FCC Form 732, File No. SAT-ASG-20080609-00120, granted Aug. 6, 2008 ("Assignment Grant").

Hogan & Hartson LLP  
Columbia Square  
555 Thirteenth Street, N.W.  
Washington, DC 20004  
+1.202.637.5600 Tel  
+1.202.637.5910 Fax

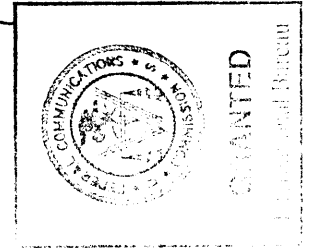
www.hhlaw.com  
Karis A. Hastings  
Counsel  
+1.202.637.5600  
kahastings@hhlaw.com

30 Day Extension

File # SAT-ASG-20080609-00120  
Call Sign S2676 Grant Date 9/5/08  
(or other identifier)

Term Dates

From: Robert G. Nelson  
To: Chief Satellite Division  
Approved: Robert G. Nelson



acknowledgment from Westchester Fire Insurance Company that it will continue to be bound by Bond Number K0 72 95 48 0 upon consummation of the assignment; or (2) a new bond in the amount of \$750,000, pursuant to the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003); or (3) proof that the launch and operating milestone for the AMC-21 space station has been satisfied by launch and operation of the spacecraft. *Id.* at 2, ¶ 2.

AMC-21 was successfully launched on August 14 but has not yet begun operations pending the completion of in-orbit testing. As a result, the Parties will not be in a position to demonstrate compliance with clause 3 of the above condition of the Assignment Grant prior to the current deadline of September 5. However, the AMC-21 tests are scheduled to be completed later this month, and the spacecraft is expected to commence operations at its assigned orbital location on October 1. Accordingly, the Parties anticipate being able to satisfy clause 3 by early October and request that the Commission grant a 30-day extension of the compliance deadline to accommodate this schedule. An affidavit attesting to the facts relating to the launch and planned commencement of operations is attached hereto as Annex 1.

SES Americom confirms that pending completion of testing and commencement of operations of AMC-21, Bond Number K0 72 95 48 0 remains in effect. SES Americom will not cancel the bond until after AMC-21 has begun operating at its assigned orbital location.

For the foregoing reasons, the Parties request a 30-day extension of time to demonstrate compliance with paragraph 2 of the Assignment Grant. Please address any questions concerning this matter to the undersigned.

Respectfully submitted,



Karis A. Hastings  
Counsel for SES Americom, Inc. and  
SES Satellites (Gibraltar) Ltd.

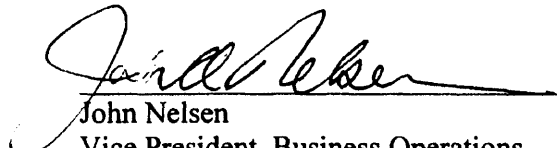
cc: Robert Nelson  
Fern Jarmulnek  
Karl Kensinger  
Andrea Kelly  
Mark Young

**ANNEX 1**

**DECLARATION OF JOHN NELSEN**

I, John Nelsen, Vice President, Business Operations, of SES Satellites (Gibraltar) Ltd., hereby certify under penalty of perjury as follows:

The AMC-21 spacecraft was successfully launched on August 14, 2008. The spacecraft is currently positioned at 136° W.L., where in-orbit testing of the satellite is in process. To date, all test results have been nominal. Assuming that no anomalies occur, testing will be completed later this month, and the satellite will then be drifted to its assigned orbital location, 124.9° W.L. Operations of AMC-21 at 124.9° W.L. are currently expected to begin on October 1, 2008.

  
John Nelsen  
Vice President, Business Operations  
SES Satellites (Gibraltar) Ltd.

Dated: September 4, 2008.