



International Bureau

Federal Communications Commission
Washington, DC 20554

August 29, 2005

Nancy J. Eskenazi, Esq.
Vice President and Associate General Counsel
SES Americom, Inc.
Four Research Way
Princeton, NJ 08540

Re: Application of SES Americom, Inc. for Authority to Launch and Operate
A Ku-Band Expansion Satellite at the 125° W.L. Orbital Location

Dear Ms. Eskenazi:

On June 22, 2005, SES Americom, Inc. (SES Americom) filed an application for authority to launch and operate a Ku-band expansion satellite at the 125° W.L. orbital location, which is to be designated AMC-21.¹ We find that, although the application is substantially complete as filed, certain additional information would assist us in completing our review of the application.

Section 25.140(b)(2) of the Commission's rules requires applicants for space station authorizations in the fixed-satellite service to demonstrate their proposed systems are compatible with the Commission's two-degree orbital spacing framework.² Due to uncertainty regarding this rule, the Commission has issued two Public Notices to provide further information to potential applicants. Specifically, in 2003, the Commission issued a Public Notice that provided guidance as to the type of information that must be included in the "two-degree interference analysis" and notified potential applicants that failure to submit this information would render the applications incomplete.³ In 2004, the Commission issued a Public Notice that clarified that applicants must submit a two-degree interference analysis even if there are no currently authorized space stations within two degrees of the proposed space station.⁴

SES Americom has provided link noise budgets, modulation parameters, and overall link performance analyses for both its analog and digital carriers, consistent with the requirements of Section 25.140(b)(2). In addition, SES Americom provided an interference analysis which demonstrates that the *digital* signals from its proposed space station are compatible with those of space stations located two degrees away.⁵ This analysis complies with Section 25.140(b)(2) and the 2003 and 2004 Public Notices.

¹ Application of SES Americom, Inc. for Authority to Launch and Operate a Ku-band Expansion Satellite at the 125° W.L. Orbital Location, File No. SAT-LOA-20050622-00133 (filed June 22, 2005) ("Application").

² 47 C.F.R. § 25.140(b)(2).

³ International Bureau Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Application Interference Analysis, *Public Notice*, 18 FCC Rcd 25099 (2003).

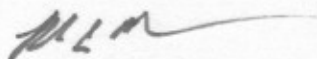
⁴ International Bureau Satellite Division Information: Clarification of 47 C.F.R. § 25.140(b)(2), Space Station Interference Analysis, *Public Notice*, 19 FCC Rcd 10652 (2004).

⁵ See Americom Application at Annex 3, p. 26.

Nevertheless, the analysis does not address analog TV/FM signals because, according to SES Americom, it coordinates analog signals with adjacent satellite operators on a case-by-case basis.⁶ While Section 25.140(b)(2) provides discretion to applicants regarding the radiofrequency carriers for which interference analyses are provided,⁷ we believe that an interference analysis that includes the analog TV/FM signals would be useful to future applicants and should be included with the application. Accordingly, we require SES Americom to amend its application to include such an analysis by September 12, 2005. Failure to respond in a timely manner will result in dismissal of the application.⁸

This action is taken pursuant to the Commission's rules on delegated authority, 47 C.F.R. § 0.261.

Sincerely,



Robert G. Nelson
Chief, Satellite Engineering Branch
Satellite Division

cc: Karis A. Hastings, Esq.
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⁶ *Id.*

⁷ See 47 C.F.R. § 25.140(B)(2) (“...An applicant should provide details of its proposed r.f. carriers which it believes should be taken into account in this analysis.....”).

⁸ 47 C.F.R. § 25.112(c) (“[i]f an applicant is requested by the Commission to file any additional information or any supplementary or explanatory information not specifically required in the prescribed application form or these rules, a failure to comply with the request within a specified time period will be deemed to render the application defective and will subject it to dismissal.”)