

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
SES Americom, Inc.	)	
	)	
Application for Authority to Operate	)	File No. SAT-LOA-_____
Amazonas-2, an in-Orbit Satellite, at	)	
72.0° W.L.	)	
	)	

**APPLICATION FOR AUTHORITY TO OPERATE AMAZONAS-2, AN IN-ORBIT
SATELLITE, AT 72.0° W.L.**

SES Americom, Inc. (“SES”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby requests an FCC license to operate the Amazonas-2 satellite (former call sign S2793) at the 72.0° W.L. orbital location with $\pm 0.1^\circ$ station-keeping tolerance.²

Amazonas-2 is a Brazil-licensed satellite currently operated by Hispamar Satellites, S.A. (“Hispamar”). An affiliate of SES has contracted with an affiliate of Hispamar to relocate the satellite to 72.0° W.L., where SES will operate Amazonas-2 in the Ku-band frequencies under Commission license and pursuant to U.S. and certain foreign International Telecommunication Union (“ITU”) filings at 72° W.L. Amazonas-2 will provide follow-on standard Ku-band capacity for the AMC-3 satellite (S2162) currently at 72.0° W.L.³ once AMC-3 reaches its end-

¹ 47 C.F.R. § 25.114.

² Amazonas-2 is a C-/Ku-band satellite (COSPAR No. 2009-054A). SES is only seeking authorization for some of the satellite’s Ku-band frequencies. Additionally, SES will operate the satellite at 72.0° W.L. in an inclined (N/S) station-keeping box.

³ See *SES Americom Inc., Application to Modify Authorization*, Stamp Grant, ICFS File No. SAT-MOD-20220827-00098 (granted Mar. 11, 2024).

of-life, and will also provide expansion capacity in extended Ku-band and Appendix 30B Ku-band. Grant of this application will serve the public interest by enabling SES to expand capacity to meet customer demand, especially for commercial aviation services in the North American and adjacent Atlantic Ocean regions.

I. SES IS QUALIFIED TO HOLD THE AUTHORIZATION REQUESTED HEREIN.

A. Legal Qualifications

SES is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates SES's compliance with the Commission's basic legal qualifications.⁴ In addition, SES already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.⁵

B. Technical Qualifications

As demonstrated in the attached Form 312, Schedule S, and Engineering Statement, SES is technically qualified to hold the authorization requested herein. Specifically, SES provides the information required by Section 25.114 of the Commission's rules.⁶ In addition, SES's

⁴ Because Amazonas-2, like all other satellites licensed to SES and its affiliates, will operate on a non-common carrier basis, Section 310(b) is not applicable to this license. *See Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 n.5 (IB 2004).

⁵ *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consol. Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 7368, 7381 ¶ 23 (2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

⁶ 47 C.F.R. § 25.114.

Engineering Statement provides information on compliance with the Commission’s orbital debris mitigation rules.

II. PROPOSED OPERATIONS

Amazonas-2 was launched on September 30, 2009, and is currently licensed by Brazil to Hispamar. SES seeks U.S. licensing authority to operate part of the Ku-band payload aboard Amazonas-2 in the following frequencies at 72.0° W.L.:

Frequencies	10.95-11.2 GHz (space-to-Earth) 11.2-11.45 GHz (space-to-Earth) 11.7-12.2 GHz (space-to-Earth) 13.0-13.25 GHz (Earth-to-space) 13.75-14.5 GHz (Earth-to-space) Telemetry, Tracking, and Command (“TT&C”) center frequencies: 11.703 GHz and 12.19825 GHz (space-to-Earth) 13.997 GHz and 14.496 GHz (Earth-to-space)
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From the 72.0° W.L. orbital location, Amazonas-2 will provide Ku-band services to North America and the surrounding Atlantic Ocean regions, as shown in the accompanying Engineering Statement and Schedule S, predominantly to commercial aviation customers.

SES proposes to operate Amazonas-2 at the 72.0° W.L. orbital location under U.S. and certain non-U.S. ITU satellite network filings. Specifically, operations in the conventional Ku-band will be under the existing U.S. ITU filing, USASAT-35W; operations in the Appendix 30B FSS bands (13.0-13.25 GHz uplink / 11.2-11.45 GHz downlink) will be under a new U.S. ITU filing to be submitted shortly; and operations in the non-Appendix 30B extended Ku-band will be conducted under ITU satellite network filings submitted by Luxembourg (LUX-G15-48) and the United Kingdom (GIBSAT-72.5W) and assigned to affiliates of SES. SES requests that the U.S. confirm its non-objection to bringing into use the LUX-G15-48 filing and bringing back

into use the GIBSAT-72.5W filing with Amazonas-2, in accordance with ITU Circular Letter CR/333 (May 2, 2012).

Under SES's contractual arrangements with Hispamar, upon grant of the Commission's authorization to SES, the Amazonas-2 satellite will be operated at 72.0° W.L. in accordance with the requirements of SES's FCC authorization and Hispamar will abide by the legal direction of SES with regards to the operation of the satellite under such authorization. Upon expiry or earlier termination of the agreement, Hispamar will de-orbit the satellite promptly from 72.0° W.L. Hispamar has notified the Brazilian administration of the relocation of Amazonas-2.⁷

III. REQUEST FOR WAIVERS.

To the extent necessary, SES requests waivers of: (a) Footnote NG52 of the U.S. Table of Frequencies Allocations for operations in the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands; (b) the 12.7 GHz filing freeze and footnote NG52 as applied to the 12.75-13.25 GHz band;⁸ (c) 47 C.F.R. § 25.210(j) to allow $\pm 0.1^\circ$ East/West station-keeping tolerance (instead of $\pm 0.05^\circ$); (d) 47 C.F.R. § 25.210(f), which requires that FSS space stations employ full frequency re-use; and (e) 47 C.F.R. § 25.114(d)(14)(ii), which requires a statement indicating whether the space station operator has assessed and limited the probability that the space station will become a source of debris by collision with small debris or meteoroids. SES notes that the FCC has

⁷ Specifically, Hispamar notified the Gerente de Outorga e Licenciamento de Estacoes, Superintendencia de Outorga e Recursos a Prestacao, Agencia Nacional de Telecomunicacoes (ANATEL) on May 6, 2026.

⁸ See *180-Day Freeze on Applications for New or Modified Authorizations for the 12.7 to 13.25 GHz Band*, Public Notice, 37 FCC Rcd 10714 (2022) ("*12.7-13.25 GHz Freeze Notice*"); *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, Order, Report and Order, Further Notice of Proposed Rulemaking, Notice of Proposed Rulemaking, 38 FCC Rcd 5283 ¶ 44 (2022) (making the 180-day 12.7 GHz freeze permanent). See also *Satellite Spectrum Abundance*, Notice of Proposed Rulemaking, 40 FCC Rcd 3794 ¶ 31 (2025) (inviting comment on lifting the 12.7 GHz freeze) ("*Satellite Abundance NPRM*").

previously determined waiver of Section 25.283(c) of its rules is not necessary for the Amazonas-2 spacecraft.⁹

Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”¹⁰ Good cause exists if “special circumstances warrant a deviation from the general rule and such deviation will serve the public interest” better than adherence to the general rule.¹¹ In determining whether a waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”¹² Additionally, a waiver of the Table of Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services.”¹³

A. Waiver Request of 47 C.F.R. § 2.106, Footnote NG52

To the extent required, SES requests waiver of Footnote NG52 of the Table of Frequency Allocations to operate Amazonas-2 in the 10.95-11.2 GHz and 11.45-11.7 GHz bands domestically. Footnote NG52 restricts the use of 10.95-11.2 GHz and 11.45-11.7 GHz bands by the non-federal Fixed Satellite Service (“FSS”) in geostationary orbit (“GSO”) to international

⁹ *Hispamar Satelites, S.A., Application to Modify Authorization*, Stamp Grant ¶ 14, ICFS File No. SAT-MPL-20210603-00073 (granted Oct. 28, 2021) (“*Amazonas-2 Grant*”).

¹⁰ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹¹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹² *WAIT Radio*, 418 F.2d at 1159.

¹³ See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int’l Bur. 1995) (authorizing MSS in the C-band); see also *Application of Motorola Satellite Communications, Inc. for Modification of License*, Order and Authorization, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

systems only, except in the case of Earth Stations in Motion (“ESIM”) covered by footnote NG527A.¹⁴ SES requests a waiver of NG52 to the extent that these bands are proposed to be used for non-international, non-ESIM services in the United States.

The purpose of NG52 is to limit the number of FSS earth stations with which co-primary Fixed Services (“FS”) would need to coordinate.¹⁵ The FCC has previously found that waiving NG52 would not undermine the purpose the rule if (a) the party seeking the waiver is only downlinking in the band and agrees to “accept any level of interference from FS stations” in these bands;¹⁶ or (b) the proposed operations “involve only a small number of feeder link earth stations and thus will not hinder the development of terrestrial fixed services that share the band on a co-primary basis.”¹⁷ Consistent with Commission precedent, SES requests a waiver of NG52 to enable domestic services in the 10.7-11.7 GHz (space-to-Earth) frequencies only if such operations are on an unprotected basis,¹⁸ or on a protected basis with only a small number of gateway earth

¹⁴ 47 C.F.R. § 2.106, NG52, NG527A.

¹⁵ See *Amendment of Part 2 of the Commission’s Rules to Confirm with the Geneva Radio Regulations*, Report & Order, 26 RR 2d 1257, 1262-65 (1973). See also *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83° W.L. Orbital Location*, Order and Authorization, DA 04-3162 ¶¶ 9-13 (IB 2004). (“*EchoStar 83° Waiver*”).

¹⁶ See *id.*; *PanAmSat Licensee Corp., Application for Authority to Use the Extended Ku-band Frequencies for Domestic Service*, Order and Authorization, DA 05-2444 ¶¶ 9-11 (IB 2005) (“*PanAmSat Waiver*”); *Intelsat License LLC Application for Authority to Launch and Operate Galaxy 14R*, Stamp Grant, Condition 6, ICFS File No. SAT-LOA-20170524-00079 (granted Nov. 14, 2018) (granting a waiver of NG52 to use the 10.7-11.7 GHz band to offer domestic services on an unprotected, non-harmful interference basis) (“*Galaxy 14R Waiver*”).

¹⁷ See *Mobile Satellite Ventures Subsidiary LLC*, DA 05-1492, Order and Authorization, ICFS File No. SAT-LOA-19980702-00066 ¶ 39 (IB 2005) (“*Mobile Satellite Order*”).

¹⁸ See *Echostar 83° Waiver*; *PanAmSat Waiver*; *Galaxy 14R Waiver*.

stations.¹⁹ Each of the small number of U.S. gateway earth stations communicating with Amazonas-2 would be separately coordinated and licensed in the usual course.²⁰

For domestic operations that are allowed under the waiver on an unprotected basis, SES also agrees to abide by the customer notification requirements that the Commission has previously imposed when granting waivers of NG52.²¹ SES will inform its customers in writing, including any customers receiving end-user services from resellers accessing capacity on Amazonas-2, of the potential for interference from FS operations in the 10.7-11.7 GHz frequency band. Grant of a waiver under these circumstances would not undermine the purpose of NG52 and would be consistent with Commission precedent and the public interest.

B. Waiver Requests Relating to the 12.75-13.25 GHz.

SES is requesting authority to operate in the 13.0-13.25 GHz uplink band on Amazonas-2, and seeks two waivers in relation to that band.

Waiver of 12.7 GHz Filing Freeze. To the extent necessary, SES requests waiver of the current temporary freeze on applications for operations in the 12.7-13.25 GHz band, which was instituted to “preserve the landscape of authorized operations in the band pending the Commission’s consideration[]” of alternative use of the band.²² Most recently, the Commission has sought comment on making more intensive satellite use of the 12.7-13.25 GHz band,

¹⁹ *Mobile Satellite Order*.

²⁰ At this time, SES anticipates that one gateway communicating with Amazonas-2 will be at Intelsat’s teleport facilities in Ellenwood, Georgia.

²¹ *Galaxy 14R Waiver* Condition 6; *EchoStar 83° Waiver* ¶ 13; *PanAmSat Waiver* ¶ 11.

²² *Satellite Abundance NPRM* ¶ 9.

explaining that it is “interested in opening the 12.7 GHz band to a wider range of satellite operations by eliminating regulatory restrictions that prevent intensive satellite use of the band.”²³

A limited waiver of the current filing freeze to permit Amazonas-2 to operate in the 13.0-13.25 GHz portion of the 12.7 GHz would not undermine underlying rationale for the 12.7 GHz freeze. SES plans to only seek authority to use earth stations to communicate with Amazonas-2 that were authorized for uplink transmissions in the 12.75-13.25 GHz prior to—and thus, not subject to—the 12.7 GHz filing freeze, or which are co-located with or near such previously authorized earth stations.²⁴ As a result, a waiver the 12.7 GHz freeze to permit Amazonas-2 to communicate with such earth stations would not increase the potential for interference nor do anything to alter “the landscape of authorized operations” that the 12.7 GHz freeze is intended to preserve pending potential reconfiguration of the band. SES accepts that any uplink transmissions in the 13.0-13.25 GHz portion of the 12.7 GHz band would be conditional on and subject to the outcome of the pending proceedings concerning the 12.7 GHz band.

Waiver of Footnote NG52. To the extent necessary, SES also requests a waiver of footnote NG52, which restricts the geostationary FSS use of the 12.75-13.25 GHz uplink band to international systems only. As explained above, the purpose of NG52 is to limit the number of FSS earth stations with which co-primary FS would need to coordinate. The Commission has previously waived this rule where the proposed operations “involve only a small number of feeder link earth stations and thus will not hinder the development of terrestrial fixed services that share

²³ *Id.* ¶ 2.

²⁴ For instance, Intelsat’s Ellenwood, Georgia earth station, E000048, was authorized to transmit in the 12.7 GHz band in 2019. See *Radio Station Authorization, E000048*, Stamp Grant at 1-2, ICFS File No. SES-MFS-20181112-03155 (granted Apr. 15, 2019).

the band on a co-primary basis.”²⁵ In this case, SES proposes communicate with Amazonas-2 using a small number of gateway earth stations already authorized to uplink in the 12.75-13.25 GHz band, or which are co-located with or near such earth stations. As a result, the proposed use of the 12.75-13.25 GHz band will not increase the coordination burden or otherwise hinder the development of terrestrial fixed services in the same band.

For all of these reasons, grant of the requested waivers in the 12.75-13.25 GHz band would not undermine the purposes of the respective rules, would be consistent with Commission precedent, and would serve the public interest by allowing SES to provide expanded capacity and services using Amazonas-2 at the 72.0° W.L. location.

C. Waiver Request of 47 C.F.R. § 25.210(j).

SES requests that the FCC grant a waiver of the $\pm 0.05^\circ$ East/West station-keeping requirement, 47 C.F.R. § 25.210(j), and authorize Amazonas-2 to instead operate within a 0.1° station-keeping box. The Commission has previously waived this rule based on a finding that allowing an increased station keeping volume would “not adversely affect the operations of other spacecraft, and would conserve fuel for future operations.”²⁶

²⁵ See *Mobile Satellite Order* ¶ 39.

²⁶ See, e.g., *Application of Intelsat License LLC to Modify Authorization for Intelsat 902 (S2406)*, ICFS File No. SAT-MOD-20240430-00091, Stamp Grant ¶ 19 (granted June 26, 2024) (waiving Section 25.210(j) of the Commission’s rules); *Petition of Intelsat License LLC for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List for Ku- and S-band Operations at 143° W.L.*, ICFS File No. SAT-PDR-20191205-00143, Stamp Grant ¶ 19 (granted Apr. 29, 2020) (waiving same because “operating HISPASAT 143W-1 at a $\pm 0.1^\circ$ station-keeping tolerance will have no adverse impact on other operators” and “will also allow Intelsat to conserve fuel and extend the life of HISPASAT 143W-1”); *Application of SES Americom, Inc. for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, ¶¶ 10-14 (2005) (agreeing with SES “that increasing the station-keeping volume of the Satcom SN4 spacecraft will not adversely affect the operations of other spacecraft, and would conserve fuel for future operations”).

The present request for waiver fits squarely within Commission precedent. Increasing the Amazonas-2 satellite's East/West tolerance would conserve fuel because the need for eccentricity maneuvers would be significantly reduced. The resulting fuel savings will maximize the use of the satellite and promote the continued efficient use of orbital resources. In addition, allowing a 0.1° station-keeping box would not adversely affect the operations of any other spacecraft. A list of the known operational satellites within $\pm 6^\circ$ of the 72.0° W.L. orbital location is provided in the table below:

Satellite Name	Location	Operator
SES-10	66.9° W.L.	New Skies Satellites B.V. (SES)
SES-17	67.1° W.L.	SES-17 S.a.r.l.
ViaSat-2	69.9° W.L.	Viasat, Inc.
Star One D2	70.0° W.L.	Embratel
Star One C4	70.0° W.L.	Embratel
ARSAT-1	71.8° W.L.	Arsat
Amazonas-2	72.0° W.L.	SES
AMC-3 ²⁷	72.0° W.L.	SES
Nimiq 5	72.7° W.L.	EchoStar Broadcasting Corp.
Horizons 2	73.8° W.L.	Intelsat (SES)
Hispasat 74W-1	74.0° W.L.	Hispasat
Star One C3	75.0° W.L.	Embratel
Intelsat 16	76.2° W.L.	Intelsat (SES)
Quetzsat-1	77.0° W.L.	DISH Operating L.L.C.
HG-03	77.1° W.L.	China SatNet

The operation of Amazonas-2 with a 0.1° station-keeping box will have a negligible impact on the interference environment for adjacent satellites. SES's proposed operations will not cause any more interference or require any more protection than a satellite operating within a 0.05° station-keeping box and would, in any event, be operated consistent with all applicable

²⁷ SES plans to deorbit the AMC-3 satellite prior to commencing operations with Amazonas-2 at 72.0° W.L. SES and Intelsat will internally coordinate the operations of the two satellites and transition customers, as required.

coordination agreements and the Commission's rules governing operations vis-à-vis adjacent orbital locations.

Further, SES's operation of Amazonas-2 with a 0.1° station-keeping box will not affect the station-keeping of any other spacecraft. As shown in the above table, the minimum orbital separation between Amazonas-2 and its closest East-West neighbors—ARSAT 1 and Nimiq 5—are 0.2° and 0.7°, respectively. For this reason, increasing Amazonas-2's station-keeping box to 0.1° will not affect the station-keeping of any other operational satellite because, even assuming a 0.1° station-keeping box for nearby satellites, as there will be no overlapping station-keeping tolerances. Finally, SES is not aware of any plans to deploy any other geostationary satellite $\pm$ 6° from the Amazonas-2 satellite at 72.0° W.L.

D. Waiver Request of 47 C.F.R. § 25.210(f).

As noted in its previous Commission authorization, the Amazonas-2 satellite was not designed to utilize orthogonal polarizations or spatially isolated beams in the 13.0-13.25 GHz and 11.2-11.45 GHz sub-bands. Thus, SES requests that the Commission again partially waive the full frequency re-use requirements for FSS space stations contained in Section 25.210(f) as applicable to SES's requested authority to operate the Amazonas-2 satellite at 72.0° W.L. in those bands,²⁸ for the same reasons articulated in the *Amazonas-2 Grant*.²⁹

E. Waiver Request of 47 C.F.R. § 25.114(d)(14)(ii).

SES requests waiver of Section 25.114(d)(14)(ii) of the Commission's rules, which requires a statement indicating whether the space station operator has assessed and limited the

²⁸ 47 C.F.R. § 25.210(f).

²⁹ *Amazonas-2 Grant* ¶ 13 (finding that partial waiver of the Commission's full frequency re-use requirements as applicable to the Amazonas-2 satellite's operations in the 13.0-13.25 GHz and 11.2-11.45 GHz sub-bands would not undermine the purpose of 25.210(f)).

probability that the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal.³⁰ It also requires the statement to include whether this probability for an individual space station is 0.01 (1 in 100) or less, as calculated using the National Aeronautics and Space Administration's ("NASA") DAS or a higher fidelity assessment tool.³¹

Good cause exists here to waive the orbital debris statement requirements in Section 25.114(d)(14)(ii). Amazonas-2 was launched on September 30, 2009, and was procured, designed, and manufactured in the years prior. SES does not have the information needed to use NASA's DAS or other higher fidelity assessment tool to determine the exact probability of whether "the space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal," including if the probability is 0.01 or less.³²

Waiver is appropriate in this case to avoid undue hardship. Even if SES had the information necessary to complete a DAS analysis, the satellite has been on orbit for many years and cannot be retrieved and modified. As such, there is no way to further limit this risk in the event that a DAS analysis would result in an outcome probability above 0.01, and waiving Section 25.114(d)(14)(ii) will not affect the satellite's risk of becoming a source of debris. Grant of waiver also will not impact the satellite's previously approved orbital debris plans. Finally, grant of waiver is also consistent with Commission precedent.³³

³⁰ 47 C.F.R. § 25.114(d)(14)(ii).

³¹ *Id.*

³² *Id.*

³³ See, e.g., *Application of Intelsat License LLC to Modify Authorization for Intelsat 9*, Stamp Grant, ICFS File No. SAT-MOD-20240930-00208, ¶ 13 (granted Apr. 2, 2025) (concluding that

IV. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST.

The authorization requested herein will serve the public interest by adding capacity at the 72.0° W.L. location following the deorbit of the AMC-3 satellite, which will serve customers in North America and adjacent Atlantic Ocean regions.

V. CONCLUSION.

In light of the foregoing, SES respectfully requests that the Commission grant the authorization requested herein.

Respectfully submitted,

Jennifer D. Hindin
WILEY REIN LLP
2050 M Street, NW
Washington, DC 20036

/s/ Daniel C.H. Mah
Daniel C.H. Mah
Vice President, Legal & Regulatory Affairs
SES Americom, Inc.

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“in the event of a finding that the probability [that the space station will become a source of debris by collision with small debris or meteoroids] were greater than 0.01, Intelsat would not be able to reduce the probability except through the addition of shielding or other modification to the space station, which is not currently feasible for an already in-orbit space station.).