

Date & Time Filed: May 20 2008 5:50:40:426PM
File Number: SAT-MOD-20080520-00107

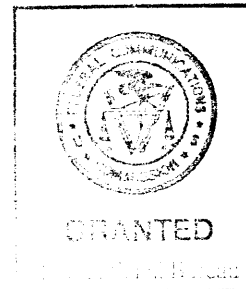
FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM	FCC Use Only
FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
S2676 AMC- 21 Reassignment to 124.9 WL

1-8. Legal Name of Applicant

Name:	SES Americom, Inc.	Phone Number:	609-987-4000 x4187
DBA Name:		Fax Number:	609-987-4233
Street:	4 Research Way	E-Mail:	nancy.eskenazi@ses-amicom.com
City:	Princeton	State:	NJ
Country:	USA	Zipcode:	08540 -
Attention:	Ms Nancy J Eskenazi		



w/conditions

File # SAT-MOD-20080520-00
107

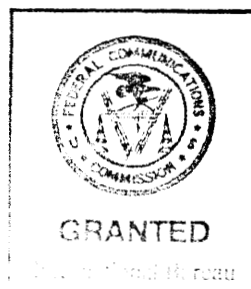
Call Sign S2676 Grant Date 7/30/08
(or other identifier)

Term Dates
From _____ To: _____
Approved: [Signature]
Policy Branch Chief

Attachment
IBFS File No. SAT-MOD-20080520-00107
July 30, 2008

SES Americom, Inc. ("SES Americom") request, IBFS File No. SAT-MOD-20080520-00107,¹ IS GRANTED. Accordingly, SES Americom is authorized to operate its Fixed Satellite Service (FSS) space station, AMC-21 (Call Sign: S2676), at the 124.9° W.L. orbital location using the 14.0- 14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) conventional Ku-band frequencies. Other than operating AMC-21 at a slight offset from original authorization at 125° W.L orbital location, the conditions contained in the prior authorizations² for the AMC-21 space station continue to apply. This authorization is subject to the terms of the application, the previously authorized technical specifications for AMC-21 for operational parameters other than orbital location, the conditions of this attachment, and the Federal Communication Commission's rules.

1. SES Americom shall maintain the spacecraft with an east/west longitudinal station keeping tolerance of 0.05 degrees.
2. SES Americom has 30 days from the date of this grant to decline the authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
3. This grant is issued pursuant to 47 C.F.R. § 0.261 of the Commission's rules on delegated authority and is effective immediately. Petitions for Reconsideration under Section 1.106 or Applications for Review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106 and 1.115, may be filed within 30 days of the date of the public notice announcing this action.



File # SAT-MOD-20080520-00107
Call Sign S2676 Grant Date 7/30/08
(or other identifier) Term Dates
From _____ To: _____
Approved: [Signature]
Policy Branch Chief

¹ Application was placed on Public Notice for filing on May 23, 2008 (Report No. SAT-00525). No comments were filed.

² IBFS File Nos. SAT-LOA-20050622-00133, amended by SAT-AMD-20050908-00175, modified by SAT-MOD-20071128-00165.

9-16. Name of Contact Representative

Name:	Karis A. Hastings, Esq,	Phone Number:	202-637-5767
Company:	Hogan & Hartson LLP	Fax Number:	202-637-5910
Street:	555 Thirteenth Street, NW Columbia Square	E-Mail:	kahastings@hhlaw.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004-
Attention:		Relationship:	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
- (N/A) b2. Application for Registration of New Domestic Receive-Only Station
- b3. Amendment to a Pending Application
- b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- b7. Notification of Minor Modification
- (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- (N/A) b10. Other (Please specify)
- (N/A) b11. Application for Earth Station to Access a Non-U.S. satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States
- (N/A) b12. Application for Database Entry
- b13. Amendment to a Pending Database Entry Application
- b14. Modification of Database Entry

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:	
<input checked="" type="checkbox"/> a. Fixed Satellite <input type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input type="checkbox"/> d. Earth Exploration Satellite <input checked="" type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)	
21. STATUS: Choose the button next to the applicable status. Choose only one. <input type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier	22. If earth station applicant, check all that apply. <input type="checkbox"/> Using U.S. licensed satellites <input type="checkbox"/> Using Non-U.S. licensed satellites
23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities: <input type="radio"/> Connected to a Public Switched Network <input type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A	
24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s). <input type="checkbox"/> a. C-Band (4/6 GHz) <input checked="" type="checkbox"/> b. Ku-Band (12/14 GHz) <input type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)	

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive Transmit-Only Receive-Only N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a -- authorization to add new emission designator and related service
- b -- authorization to change emission designator and related service
- c -- authorization to increase EIRP and EIRP density
- d -- authorization to replace antenna
- e -- authorization to add antenna
- f -- authorization to relocate fixed station
- g -- authorization to change frequency(ies)
- h -- authorization to add frequency
- i -- authorization to add Points of Communication (satellites & countries)
- j -- authorization to change Points of Communication (satellites & countries)
- k -- authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l -- authorization to change orbit location
- m -- authorization to perform fleet management
- n -- authorization to extend milestones
- o -- Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments. Yes No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

Yes No N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

Exhibit

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes No

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.

Yes No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.

Yes No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Request to assign AMC-21 (call sign S2676) to the 124.9 WL orbital location.

Technical Narrative

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing Nancy J. Eskenazi	46. Title of Person Signing Vice President & Assoc. General Counsel
---	--

→

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to jboley@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Attachment
IBFS File No. SAT-MOD-20080520-00107
July 30, 2008

SES Americom, Inc. ("SES Americom") request, IBFS File No. SAT-MOD-20080520-00107,¹ IS GRANTED. Accordingly, SES Americom is authorized to operate its Fixed Satellite Service (FSS) space station, AMC-21 (Call Sign: S2676), at the 124.9° W.L. orbital location using the 14.0- 14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) conventional Ku-band frequencies. Other than operating AMC-21 at a slight offset from original authorization at 125° W.L orbital location, the conditions contained in the prior authorizations² for the AMC-21 space station continue to apply. This authorization is subject to the terms of the application, the previously authorized technical specifications for AMC-21 for operational parameters other than orbital location, the conditions of this attachment, and the Federal Communication Commission's rules.

1. SES Americom shall maintain the spacecraft with an east/west longitudinal station keeping tolerance of 0.05 degrees.
2. SES Americom has 30 days from the date of this grant to decline the authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
3. This grant is issued pursuant to 47 C.F.R. § 0.261 of the Commission's rules on delegated authority and is effective immediately. Petitions for Reconsideration under Section 1.106 or Applications for Review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106 and 1.115, may be filed within 30 days of the date of the public notice announcing this action.

¹ Application was placed on Public Notice for filing on May 23, 2008 (Report No. SAT-00525). No comments were filed.

² IBFS File Nos. SAT-LOA-20050622-00133, amended by SAT-AMD-20050908-00175, modified by SAT-MOD-20071128-00165.

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

In the Matter of)
)
SES AMERICOM, INC.) File No. SAT-MOD-_____
)
Application for Modification of AMC-21)
Fixed-Satellite Space Station License)

APPLICATION OF SES AMERICOM, INC.

SES Americom, Inc. (“SES Americom”) hereby requests modification of its license for the AMC-21 fixed-satellite space station (call sign S2676) to assign the satellite to the 124.9° W.L. orbital location. SES Americom seeks to operate AMC-21 at a slight offset in order to simplify stationkeeping at the nominal 125° W.L. orbital position by eliminating any overlap of the stationkeeping volumes of AMC-21 and Intelsat’s Galaxy 14. Grant of the instant request will facilitate safe joint operation of the satellites, and therefore serve the public interest. A completed FCC Form 312 and a technical appendix are attached in support of this application.

SES Americom was granted a Commission license to launch and operate the AMC-21 Ku-band expansion satellite in September 2005.¹ In its application for the license, SES Americom indicated that prior to launch of the spacecraft, SES Americom might seek an offset from 125° W.L. in order to simplify stationkeeping.² SES Americom has constructed AMC-21

¹ See File Nos. SAT-LOA-20050622-00133; SAT-AMD-20050908-00175 (Int’l Bur. Sat. Div., grant-stamped Sept. 16, 2005). The Commission recently granted a modification of the license to reflect a change in the beam configuration of the satellite. See File No. SAT-MOD-20071128-00165 (Int’l Bur. Sat. Div., grant-stamped May 16, 2008).

² File No. SAT-LOA-20050622-00133, Narrative at 1 n.1.

on an accelerated schedule, and launch is scheduled to occur during late July or early August of this year.

SES Americom has been in discussions with Intelsat, which is licensed to operate Galaxy 14 at 125.0° W.L. and Galaxy 12 at 125.1° W.L. Intelsat also operates the satellites with Ku-band payloads that are adjacent to the 125° W.L. orbital location on either side, Galaxy 10R at 123° W.L. and Galaxy 13/Horizons 1 at 127° W.L. Intelsat has agreed to SES Americom's proposal to seek assignment of AMC-21 to 124.9° W.L., which will avoid an overlap in stationkeeping volumes at 125° W.L. and will have no material effect on the interference environment for the adjacent Intelsat satellites. Accordingly, grant of the instant modification will not adversely affect any other party and will promote the safe operation of satellites assigned to the same nominal location.

For the foregoing reasons, SES Americom requests that the Commission modify the AMC-21 license to assign the spacecraft to 124.9° W.L.

Respectfully submitted,

SES Americom, Inc.

By: /s/ Nancy J. Eskenazi

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

Of Counsel

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson L.L.P.
Washington, D.C. 20004-1109
Tel: (202) 637-5600

Dated: May 20, 2008

Technical Appendix

1. Introduction

This technical appendix is submitted in support of SES Americom's modification application seeking assignment of the AMC-21 Ku-band spacecraft to 124.90° W.L. instead of 125° W.L. SES Americom incorporates by reference herein the technical information it has already provided with respect to AMC-21,¹ and provides here technical information that is changing as a result of the modification.

2. Gain Contours

SES Americom is not submitting new contour maps with this application. The proposed shift in orbital location from 125° W.L. to 124.9° W.L. will produce no visible change in the gain contours from the maps already on file.

3. Link Budgets and Interference Analysis

The nearest operational Ku-band satellites to 125° W.L. are Intelsat's Galaxy 10R at 123° W.L. and Intelsat's Galaxy 13/Horizons 1 at 127° W.L.

SES Americom has previously submitted interference analyses to the FCC demonstrating that operation of AMC-21 in the Ku-band was compatible with adjacent satellites and with the Commission's two-degree spacing requirements. The proposed offset operation of AMC-21 will not cause any material change to the interference environment. The proposed offset would result in AMC-21 moving slightly closer to Galaxy 10R, but the resulting change in the interference environment will be negligible. Furthermore, SES Americom has coordinated the proposed reassignment of AMC-21 to 124.9° W.L. with Intelsat, which has agreed to the offset.

As shown in the table below, SES Americom has calculated that implementation of the proposed offset would result in a change of 0.58 dB in the interference environment of two-degree compliant earth stations communicating in the Ku-band with Galaxy 10R at 123° W.L.

¹ See File Nos. SAT-LOA-20050622-00133; SAT-AMD-20050908-00175; SAT-MOD-20071128-00165.

	<u>123° W.L.</u>
<u>Currently Assigned Position (125)</u>	
Closest Offset Angle, taking into account 0.05 degree stationkeeping	1.9
Gain* (1) @ Offset angle	22.03 dB
<u>Proposed Orbital Position (124.9)</u>	
Closest Offset Angle, taking into account 0.05 degree stationkeeping	1.8
Gain (2)* @ Offset angle	22.62 dB
<u>Δ (Gain(1) - Gain (2))</u>	<u>-0.58 dB</u>
* Gain of a 29-25 log (theta) compliant antenna	

Given that the proposed offset operation of AMC-21 will not result in any material change to the interference environment with respect to AMC-21 and existing or future adjacent satellites, no additional link budget analysis is provided herein. In the unlikely event that any future concerns arise concerning operations of AMC-21 at the proposed offset location, SES Americom will coordinate as necessary with the adjacent operators in order to arrive at a mutually satisfactory solution.

4. Orbital Debris Mitigation

This section supplements the information provided in the original AMC-21 application concerning the elements required under Section 25.114(d)(14) of the Commission's Rules.

§ 25.114(d)(14)(i): SES Americom has assessed and limited the amount of debris released in a planned manner during normal operations of AMC-21.

SES Americom has also assessed and limited the probability of the space station becoming a source of orbital debris by collisions with small debris or meteoroids that could cause loss of control and prevent post-mission disposal. SES Americom requires that spacecraft manufacturers assess the probability of micrometeorite damage that can cause any loss of functionality. This probability is then factored into the ultimate spacecraft probability of success. Any significant probability of damage would need to be mitigated in order for the spacecraft design to meet SES Americom's required probability of success of the mission. SES Americom has taken steps to limit the effects of any collisions through shielding, the placement of components, and the use of redundant systems.

§ 25.114(d)(14)(ii): SES Americom has assessed and limited the probability of accidental explosions during and after completion of mission operations. As part of the Safety Data Package submission for SES Americom spacecraft, an extensive analysis

is completed by the spacecraft manufacturer, reviewing each potential hazard relating to accidental explosions. A matrix is generated indicating the worst-case effect, the hazard cause, and the hazard controls available to minimize the severity and the probability of occurrence. Each subsystem is analyzed for potential hazards, and the Safety Design Package is provided for each phase of the program running from design phase, qualification, manufacturing and operational phase of the spacecraft. Also, the spacecraft manufacturer generates a Failure Mode Effects and Criticality Analysis for the spacecraft to identify all potential mission failures. The risk of accidental explosion is included as part of this analysis. This analysis indicates failure modes, possible causes, methods of detection, and compensating features of the spacecraft design.

The design of the AMC-21 spacecraft is such that the risk of explosion is minimized both during and after mission operations. In designing and building the spacecraft, the manufacturer took steps to ensure that debris generation will not result from the conversion of energy sources on board the satellite into energy that fragments the satellite. All propulsion subsystem pressure vessels, which have high margins of safety at launch, have even higher margins in orbit, since use of propellants and pressurants during launch decreases the propulsion system pressure. Burst tests are performed on all pressure vessels during qualification testing to demonstrate a margin of safety against burst. Bipropellant mixing is prevented by the use of valves that prevent backwards flow in propellant and pressurization lines. All pressures, including those of the batteries, will be monitored by telemetry.

§ 25.114(d)(14)(iii): SES Americom has assessed and limited the probability of the space station becoming a source of debris by collisions with large debris or other operational space stations. Specifically, SES Americom has assessed the possibility of collision with satellites located at, or reasonably expected to be located at, the requested orbital location or assigned in the vicinity of that location.

The instant application seeks authority for operation of AMC-21 at the 124.9° W.L. orbital location. Intelsat is licensed to operate Galaxy 14 at 125.0° W.L. and Galaxy 12 at 125.1° W.L. Northrop Grumman Space & Mission Systems Corporation has a pending application to operate a geostationary satellite at 125° W.L. SES Americom is not aware of any other FCC- or non-FCC licensed spacecraft that are operational or planned to be deployed at 125° W.L. or to nearby orbital locations such that there would be an overlap with the requested stationkeeping volume of AMC-21.

§ 25.114(d)(14)(iv): Post-mission disposal of the satellite from operational orbit will be accomplished by carrying out maneuvers to a higher orbit. SES Americom plans to maneuver AMC-21 to a disposal orbit with a minimum perigee of 268 km above the normal operational altitude. The proposed disposal orbit altitude complies with the altitude resulting from application of the IADC formula based on the following calculation:

Area of the satellite (average aspect area): 25 m²

Mass of the spacecraft: 1144 kg

C_R (solar radiation pressure coefficient): 1.5

Therefore the Minimum Disposal Orbit Perigee Altitude, as calculated under the IADC formula is:

$36,021 \text{ km} + (1000 \times C_R \times A/m) = 36,054 \text{ km}$, or 268 km above the GSO arc (35,786 km)

SES Americom intends to reserve 7 kg of fuel in order to account for post-mission disposal of AMC-21. SES Americom has assessed fuel gauging uncertainty and has provided an adequate margin of fuel reserve to address the assessed uncertainty.

5. Schedule S

As discussed above, the proposed reassignment of AMC-21 to offset the satellite by 0.1 degrees from 125° W.L. will not result in any material changes to the spacecraft's operating characteristics or to the interference environment. As a result, the information requested in Schedule S duplicates information that is already on file with the Commission concerning the technical parameters of AMC-21's operation. In similar cases involving requests for slight offsets from the nominal orbital position, the Satellite Division has not required the submission of a new Schedule S.² Accordingly, SES Americom is not filing a new Schedule S with this application. SES Americom will nevertheless prepare and submit a Schedule S if requested to do so by the Satellite Division.

² See, e.g., File No. SAT-MOD-20040405-00076 (PanAmSat request for authority to operate SBS-6 at 74.05° W.L. rather than 74.0° W.L.).

DECLARATION OF KRISH JONNALAGADDA

I, Krish Jonnalagadda, hereby certify under penalty of perjury that I am the technically qualified person responsible for preparation of the technical information contained in the foregoing exhibit; that I am familiar with the technical requirements of Part 25; and that I either prepared or reviewed the technical information contained in the exhibit and that it is complete and accurate to the best of my knowledge, information and belief.

/s/ Krish Jonnalagadda
Manager, Satellite Market Development
SES Americom, Inc.

Dated: May 20, 2008