

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

*In the Matter of*

**SES AMERICOM, INC.**

Application for Modification of AMC-1  
Fixed-Satellite Space Station License

IBFS File Nos. SAT-MOD-20140730-00089

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**COMMENTS OF DIRECTV, LLC**

DIRECTV, LLC (“DIRECTV”) files these comments in response to the application filed by SES Americom, Inc. (“SES”) for a modification of its license to operate the AMC-1 satellite for relocation from the 103° W.L. orbital location to 47.5° W.L. DIRECTV has no views with respect to SES’s proposed operations at this new slot. However, SES should not be authorized to relocate this satellite until it has a replacement satellite licensed to operate at AMC-1’s current location that can ensure continuity of service. Until such time as SES can demonstrate this to be the case, action on its application should be deferred.

AMC-1 is a hybrid C/Ku-band satellite that is currently licensed to operate at 103° W.L.<sup>1</sup> In its application, SES asserts that “[t]he replacement for AMC-1, the SES-3 satellite, is in position and ready to begin operations at 103° W.L.”<sup>2</sup> While that statement may be true in the most literal sense, it is also highly misleading. As SES well knows, the SES-3 satellite is currently authorized

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<sup>1</sup> See Grant Stamp, IBFS File Nos. SAT-MOD-20110718-00130 (granted Oct. 13, 2011).

<sup>2</sup> See Application of SES Americom, Inc., IBFS File No. SAT- MOD-20140730-00089, Narrative at 2 (filed July 30, 2014).

only to conduct TT&C operations in the C/Ku-bands.<sup>3</sup> It has not been authorized to use any of those frequencies on SES-3 to carry communications traffic of any kind. Accordingly, that satellite is not “ready to begin operations” in a way that would allow it to replace AMC-1. Until SES has a satellite at 103° W.L. that actually has both the capability and legal authority to provide the services currently provided by AMC-1, the Commission should defer any action on this application.

Moreover, assuming that SES-3 will be that replacement satellite, there is another issue SES should be required to address. In seeking a license for SES-3 earlier this year, SES stated that “AMC-1 Hosts Leading Media and Information Industry Customers” with its C- and Ku-band payloads, including a “Premier media & entertainment provider serving all U.S. homes,” “The nation’s most watched regional sports networks,” and a “Fortune 100 global delivery firm.”<sup>4</sup> In addition, it asserted that “[t]he transfer of Ku-band traffic to SES-3 will be unusually complicated and prolonged because SES-3 has a standard polarization orientation and AMC-1 does not.”<sup>5</sup> According to SES, the adjustments required to accommodate this change in polarization involve “site visits to thousands of sites dispersed across the country” which must be scheduled “to avoid significant events” and to include the “lead time to plan the deployment of personnel, equipment, and other resources.”<sup>6</sup>

One party in particular raised concerns about the transition from AMC-1 to SES-3. NBCUniversal Media, LLC (“NBCU”) deems the capacity provided by AMC-1 to be “an essential part of the infrastructure [it] uses to both collect and distribute programming” that is “available to

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<sup>3</sup> See *SES Americom, Inc.*, 29 FCC Rcd. 3678, ¶ 12a (Int’l Bur. 2014).

<sup>4</sup> See Letter from Karis A. Hastings to Marlene H. Dortch, IBFS File Nos. SAT-RPL-20121228-00227 and SAT-AMD-20131113-00132, Attachment at 4 (Mar. 6, 2014).

<sup>5</sup> *Id.* at 5.

<sup>6</sup> *Id.*

virtually every viewing household [in the U.S.] – urban, suburban, or rural – including the many households that rely on over-the-air television distribution rather than subscribing to a paid service.”<sup>7</sup> NBCU expressed its concern that “moving Ku-band traffic from AMC-1 to SES-3 will be much more time-consuming and intricate than the typical shift of services to a replacement satellite,” and would require “truck rolls to dispatch trained personnel to each of approximately 200 earth station locations across the nation that use Ku-band capacity at 103° W.L.”<sup>8</sup> NBCU estimated that this transition would take “a period of roughly six months” and must be scheduled around “significant programming events – particularly real-time sports coverage – so as to avoid the possibility of disrupting service to viewers.”<sup>9</sup> In particular, NBCU stated that it needed to complete the transition before the beginning of the NFL season in late August 2014. That season is now well underway, and will not conclude until sometime in 2015.

SES says nothing about these considerations in its application. Having raised the complexities it believes will be involved in the transition from AMC-1 to SES-3, SES should be required to explain how that transition can be accomplished without disruption to its customers and the many Americans they serve. That explanation should include, but not be limited to, a discussion of how such a transition will ensure continuity of service to NBCU and its transmission of NFL and other real-time sports coverage.

Accordingly, DIRECTV submits that action on SES’s application for modification of the AMC-1 authorization must be deferred until such time as SES can demonstrate that it has a

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<sup>7</sup> Letter from Margaret L. Tobey to Mindel de la Torre, IBFS File Nos. SAT-RPL-20121228-00227 and SAT-AMD-20131113-00132, at 1 (Jan. 16, 2014).

<sup>8</sup> *Id.* at 2.

<sup>9</sup> *Id.*



