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By Electronic Filing

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

Re: Increased North-South Stationkeeping Tolerance for AMC-7 (Call Sign S2155)

Dear Ms. Dortch:

SES Americom, Inc. ("SES"), by its attorney and pursuant to Section 25.280(a) of the Commission's rules, 47 C.F.R. § 25.280(a), hereby advises the Commission that its AMC-7 spacecraft will operate in an expanded north-south stationkeeping volume at the 135° W.L. orbital location. SES has determined that relaxation of the north-south stationkeeping parameters for AMC-7 will facilitate safe co-location of the satellite with AMC-10.¹ SES accordingly will allow AMC-7 periodically to exceed the +/- 0.05 degree north-south stationkeeping tolerance specified in the most recent AMC-7 application,² but will maintain AMC-7 within a +/- 0.1 degree north-south volume.

At 135° W.L., AMC-7 is being flown in formation with AMC-10, which is constrained in its ability to perform inclination maneuvers during eclipse and solstice periods. Because of these constraints, the AMC-10 orbit is planned so that AMC-10 will begin an eclipse or solstice period at one side of the inclination window and end at the other. During times when AMC-10 is not able to perform inclination maneuvers, the need to maintain sufficient separation between AMC-10 and AMC-7 will periodically cause AMC-10 to "chase" AMC-7 outside the +/- 0.05 degree north-south stationkeeping window. The flexibility to operate AMC-7 within an expanded north-south stationkeeping volume will enhance SES's ability to safely fly its co-located spacecraft by permitting it to maintain an adequate separation distance between AMC-7 and AMC-10 during such periods.

As discussed above, SES will not be terminating north-south stationkeeping of AMC-7, but will periodically be operating the spacecraft in a larger north-south stationkeeping volume. This

¹ Earlier this year the Commission authorized SES to relocate AMC-7 to 135° W.L. so that it can provide back-up capacity as needed for AMC-10. See Call Sign S2155, IBFS File No. SAT-MOD-20150309-00010 (the "AMC-7 Modification"), grant-stamped May 21, 2015.

² AMC-7 Modification, Schedule S item S3.f.

change in the north-south stationkeeping practices is not projected to have any material impact on the expected end-of-life of AMC-7. Operations of AMC-7 within the expanded north-south stationkeeping volume will conform to the requirements of Section 25.280(b) of the Commission's rules.

Please address any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

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