

Petra A. Vorwig Senior Legal & Regulatory Counsel

January 18, 2018

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

Re: SES Americom, Inc. Notification of Non-Routine Transmission Levels,

AMC-6 at 83° W.L., Call Sign S2347, File No. SAT-MOD-20170628-00102

Dear Ms. Dortch.

SES Americom, Inc. ("SES"), pursuant to Section 25.140(d) of the Commission's rules, 47 C.F.R. §25.140(d), hereby notifies the Commission that the non-routine transmission levels specified below have been coordinated with operators of authorized co-frequency spacecraft located within six degrees of the above-referenced SES satellite positioned at the 83° W.L. orbital location.

In preparing the information below, SES used a reference two-degree downlink EIRP density for conventional and extended Ku-band digital transmissions of 13 dBW/4kHz. As noted in the SES Petition for Reconsideration regarding the Commission's Second Report and Order in the Part 25 reform proceeding, there is a discrepancy between the language of the Order and the text of Section 25.140(a)(3)(ii) with respect to the default two-degree spacing parameters for operation in the conventional and extended Ku-band spectrum.² Specifically, in the text of the Order, the Commission stated its intention to adopt the SES proposal for an increase in the default downlink EIRP density level for digital operations in the conventional and extended Ku-band spectrum to 13 dBW/4kHz, but the rule as adopted states that the default downlink EIRP density for Ku-band digital operations is 14 dBW/4kHz. Out of an abundance of caution, SES is notifying the Commission of conventional and extended Ku-band digital transmission downlink EIRP density levels above 13 dBW/4kHz.

Frequency Band	Downlink EIRP Density Level	Uplink Input Power Density Level	Beam
11.45 – 11.7 GHz	-19 dBW/Hz		All
11.7 – 12.2 GHz	-22.6 dBW/Hz		All
13.75 – 14 GHz		-42 dBW/Hz	All

Comprehensive Review of Licensing and Operating Rules for Satellite Services, Second Report and Order, FCC 15-167, 30 FCC Rcd 14713 (2015) (the "Order").

² Petition for Reconsideration of SES Americom, Inc. and New Skies Satellites B.V., IB Docket No. 12-267, filed Sept. 19, 2016, at 15.



Please do not hesitate to contact the undersigned with any questions.

Yours sincerely,

/s/ Petra A. Vorwig

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