

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

In the Matter of)	
)	
SES AMERICOM, INC.)	File No. SAT-MOD-_____
)	Call Sign S2379
ALASCOM, INC.)	
)	
Application for Modification of AMC-8/ Aurora III)	
Fixed-Satellite Space Station License)	

JOINT REQUEST OF SES AMERICOM, INC. and ALASCOM, INC

SES Americom, Inc. (“SES”) and Alascom, Inc. (“Alascom”) (collectively, the “Licensees”) respectfully request a modification of their joint license for the AMC-8/Aurora III (“AMC-8”) C-band fixed-satellite space station to extend the license term to June 30, 2025, and to permit relocation of the satellite from 139° W.L. to 135° W.L. Grant of the requested authority will serve the public interest by allowing SES to continue to offer services using AMC-8 and to supplement the available C-band capacity at 135° W.L.

A completed FCC Form 312 is attached, and the Licensees incorporate by reference the information previously provided in support of AMC-8.¹ Information relating to the proposed relocation of the spacecraft is provided on Schedule S and in narrative form pursuant to Section 25.114 of the Commission’s Rules. The Licensees certify that apart from the matters addressed herein, no change is proposed to the information previously provided with respect to AMC-8.

¹ The most recent technical information regarding AMC-8 is found in File No SAT-MOD-20151222-00086. *See also* File No. SAT-LOA-19990601-00061.

REQUEST FOR EXTENSION OF AMC-8 LICENSE TERM

AMC-8 is a C-band satellite that is located at 139° W.L. with a license term that expires June 30, 2020. The Licensees request an extension of the AMC-8 license term to June 30, 2025. SES, which is responsible for operating the spacecraft, has calculated that there is sufficient fuel onboard AMC-8 for the spacecraft to continue providing service during the proposed extension of the license term and to deorbit the spacecraft consistent with the orbital debris mitigation plan previously approved by the Commission.

The AMC-8 satellite has experienced solar array circuit failures and battery cell failures that have affected the total power available to the spacecraft. Apart from these, the satellite's overall health is good, with all satellite subsystems functioning satisfactorily. There is no single point of failure in the satellite's design; and there is no problem with the satellite's Telemetry, Tracking and Command ("TT&C") links, including the back-up TT&C links. As a result, extending the license term for AMC-8 will serve the public interest by allowing the Licensees to continue to offer service to customers, promoting the efficient use of satellite and orbital resources.

REQUEST FOR AUTHORITY TO RELOCATE AMC-8

The Licensees seek authority to: (1) drift AMC-8 from its current position at 139° W.L. to 135° W.L. and maintain it at that location using C-band frequencies for TT&C;²

² The AMC-8 TT&C frequencies and nominal polarizations are as follows:

Command: 6423.5 MHz (Horizontal polarization; uplink)
Telemetry: 3700.5 MHz (Horizontal polarization; downlink; Vertical polarization during emergency operations), and
4199.5 MHz (Vertical polarization; downlink).

and (2) operate AMC-8 in the conventional C-band frequencies at 135° W.L.³ AMC-8 currently operates in inclined orbit at 139° W.L.,⁴ where it is collocated with SES's AMC-18 C-band spacecraft. In response to customer demand, the Licensees propose to relocate AMC-8 to 135° W.L., where it will continue to operate in inclined orbit. SES operates the AMC-4 C/Ku-band satellite at 134.9° W.L., with an east-west stationkeeping tolerance of +/- 0.05 degrees.⁵ After its relocation, AMC-8 will be available to supplement the C-band capacity at the nominal 135° W.L. orbital location. Because AMC-18 will remain in service at 139° W.L., authorizing the AMC-8 move will not affect service to existing customers.

Grant of the requested authority to relocate AMC-8 will serve the public interest and is consistent with Commission precedent. The Commission has repeatedly observed that its policy is to allow "satellite operators to rearrange satellites in their fleet to reflect business and customer considerations where no public interest factors are adversely affected."⁶ As the International Bureau has explained:

the Commission attempts, when possible, to leave spacecraft design decisions to the space station licensee because the licensee is in a better position to determine how to tailor its system to meet the particular needs of its customers. Consequently the Commission will generally grant a licensee's request to modify its system, provided

³ The Licensees have sought special temporary authority to reposition AMC-8 pending submission of and action on this modification application. *See* Call Sign S2379, File No. SAT-STA-20200319-00027.

⁴ *See* Letter of Karis A. Hastings, Counsel for SES Americom, Inc., to Marlene H. Dortch, Call Sign S2379, filed Nov. 13, 2019 (notifying the Commission that AMC-8 had commenced inclined orbit operations).

⁵ SES Americom, Inc., Call Sign S2135, File No. SAT-MOD-20170518-0073, granted July 31, 2017.

⁶ *SES Americom, Inc.*, Order and Authorization, DA 06-757 (IB rel. Apr. 7, 2006) at 4, ¶ 8, *citing Amendment of the Commission's Space Station Licensing Rules and Policies*, Second Report and Order, 18 FCC Rcd 12507, 12509, ¶ 7 (2003).

there are no compelling countervailing public interest considerations.⁷

Here, the proposed change will allow SES to make efficient use of AMC-8 to respond to demand for C-band service at 135° W.L. Relocation of AMC-8 to 135° W.L. will not adversely affect other operators. Only the TT&C frequencies of AMC-8 will be used during the drift, and the Licensees will follow standard industry practices for coordination of TT&C transmissions while the satellite is being relocated. After AMC-8's arrival satellite at 139° W.L., SES will closely control AMC-4 and AMC-8 to ensure their safe joint operation.

For the foregoing reasons, the Licensees respectfully seek a modification of the AMC-8 license to extend the satellite's license term through June 30, 2025 and to reassign the satellite to 135° W.L.

Respectfully submitted,

SES AMERICOM, INC.

ALASCOM, INC.

By: /s/ Petra A. Vorwig

By: /s/ Teresa Jackson

Petra A. Vorwig
Vice President, Legal & Regulatory Affairs
SES Americom, Inc.
1129 20th Street, N.W., Suite 1000
Washington, D.C. 20036

Teresa Jackson
Assistant Vice President – Network Services
Vice President, Alascom, Inc.
AT&T
505 E Bluff Dr
Anchorage, AK 99501

Dated: April 13, 2020

⁷ *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316, 12318, ¶ 8 (IB 1998) (footnote omitted).