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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-MOD-_____
	)	Call Sign S2347
Application for Modification of AMC-6	)	
Fixed-Satellite Space Station License	)	

REQUEST OF SES AMERICOM, INC.

SES Americom, Inc. ("SES") respectfully requests a modification of its license for the AMC-6 C/Ku-band fixed-satellite space station to permit relocation of the satellite from 83° W.L. to 139° W.L. Specifically, SES seeks authority to: (1) drift AMC-6 from its current position at 83° W.L. to 139° W.L. and maintain it at that location using C-band frequencies for Telemetry, Tracking and Command ("TT&C");[1] and (2) operate AMC-6 using C-band frequencies in order to serve existing and new customers at 139° W.L., with limited flexibility to adjust the satellite's coverage area. Grant of the requested authority will serve the public interest by allowing SES to meet evolving customer demand for C-band capacity at 139° W.L.

A completed Form 312 is attached, and SES incorporates by reference the information previously provided in support of AMC-6.[2] Information relating to the proposed relocation of the spacecraft is provided on Schedule S and in a narrative form pursuant to

[1] The Ku-band telemetry carriers on AMC-6 will not be used during the drift or after the satellite arrives at 139° W.L. The AMC-6 C-band TT&C frequencies are as follows:

Command: 6423.5 MHz (Earth-to-space)
Telemetry: 3700.5 MHz (space-to-Earth),
4199.5 MHz (space-to-Earth).

[2] The most recent technical information regarding AMC-6 is found in File No. SAT-MOD-20170628-00102. This application also incorporates by reference the updated orbital debris mitigation plan submitted in File No. SAT-MOD-20150820-00059.

Section 25.114 of the Commission's Rules. SES certifies that apart from the matters addressed herein, no change is proposed to the information previously provided with respect to AMC-6.

REQUEST FOR AUTHORITY TO RELOCATE AMC-6

AMC-6 is a U.S.-licensed hybrid C-/Ku-band satellite that currently operates at 83° W.L. SES operates the AMC-18 C-band satellite at 139° W.L.[3] To better serve existing and future customers, SES proposes to relocate AMC-6 to 139° W.L. Once AMC-6 arrives at 139° W.L., SES will transfer traffic from AMC-18 to AMC-6 and plans to relocate AMC-18 to 83° W.L.[4] SES will operate AMC-6 solely in C-band frequencies at 139° W.L. and will not use the satellite's Ku-band payload.

In order to meet customer demand at 139° W.L., the coverage of AMC-6 will be slightly different than that of AMC-18. Specifically, AMC-6 will be oriented to have additional coverage of Northern Canada as compared to AMC-18, while continuing to provide coverage of the areas served by AMC-18 today: Alaska, the Aleutian Islands, Western Canada, the Western United States, and Western Mexico. SES is also seeking flexibility to adjust the AMC-6 coverage area within a defined range in order to tailor the satellite's services to satisfy customer requirements. No existing customers will be affected by changes to the C-band coverage at 139° W.L.

Grant of the requested authority to relocate AMC-6 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

[3] SES Americom, Inc., Call Sign S2713, File No. SAT-A/O-20171221-00174, granted March 8, 2018.

[4] SES is preparing a separate application to seek authority for the relocation of AMC-18.

customer considerations where no public interest factors are adversely affected."[5] 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 there are no compelling countervailing public interest considerations.[6]

Here, the proposed modification will enable SES to make efficient use of AMC-6 and to respond to evolving customer demand for C-band service at 139° W.L. Relocation of AMC-6 to 139° W.L. will not affect service to existing customers, nor will it adversely affect other operators. Only the C-band TT&C frequencies of AMC-6 will be used during the drift, and SES will follow standard industry practices for coordination of TT&C transmissions while the satellite is being relocated. At 139° W.L., all AMC-6 operations will comply with the Commission's two-degree orbital spacing policy and will not cause harmful interference to other Fixed Satellite Service satellites in geostationary-satellite orbit.

[5] *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).

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

For the foregoing reasons, SES respectfully seeks a modification of the AMC-6 license to permit SES to relocate the satellite to 139° W.L.

Respectfully submitted,

SES AMERICOM, INC.

By: */s/ Petra A. Vorwig*

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

Dated: June 5, 2020