

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

In the Matter of)	
)	
SES AMERICOM, INC.)	File No. SAT-MOD-_____
)	Call Sign S2713
Application for Modification of AMC-18)	
Fixed-Satellite Space Station License)	

REQUEST OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) respectfully requests a modification of its license for the AMC-18 C-band fixed-satellite space station to permit relocation of the satellite from 139° W.L. to 83° W.L. Specifically, SES seeks authority to: (1) drift AMC-18 from its current position at 139° W.L. to 83° W.L. and maintain it at that location using C-band Telemetry, Tracking and Command (“TT&C”) frequencies;¹ and (2) operate AMC-18 using conventional C-band frequencies, 3700-4200 (transmit) and 5925-6425 GHz (receive), in order to serve existing and new customers at 83° W.L. Grant of the requested authority will serve the public interest by allowing SES to meet evolving customer demand for C-band capacity at 83° W.L.

A completed Form 312 is attached, and SES incorporates by reference the information previously provided in support of AMC-18.² Information relating to the proposed relocation of the spacecraft is provided on Schedule S and in a narrative form pursuant to

¹ The AMC-18 TT&C frequencies are as follows:

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

² The most recent technical information regarding AMC-18 is found in File No. SAT-A/O-20171221-00174.

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-18.

REQUEST FOR AUTHORITY TO RELOCATE AMC-18

AMC-18 is a U.S.-licensed C-band satellite that currently operates at 139° W.L. To better serve existing and future customers, SES proposes to relocate AMC-18 from 139° W.L. to 83° W.L.³ SES has filed a modification application and special temporary authority (“STA”) request to relocate the AMC-6 space station from 83° W.L. to 139° W.L.⁴ Once AMC-6 arrives at 139° W.L., SES will transfer traffic from AMC-18 to AMC-6 and proposes to relocate AMC-18 to 83° W.L.

In order to meet customer demand at 83° W.L., the coverage of AMC-18 will be slightly different than that of AMC-6. Specifically, AMC-18 will be oriented to have additional coverage of Northern Canada as compared to AMC-6, while continuing to provide coverage of the United States and Canada. No existing customers will be affected by changes to the coverage at 83° W.L.

Grant of the requested authority to relocate AMC-18 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 At 83° W.L., AMC-18 will operate under the USASAT-24V and USASAT-35R ITU filings.

⁴ See SES Americom, Inc., Call Sign S2347, File Nos. SAT-MOD-20200605-00066 & SAT-STA-20200605-00067.

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 change would enable SES to make efficient use of AMC-18 and to respond to evolving customer demand for C-band service at 83° W.L. Relocation of AMC-18 to 83° W.L. will not affect service to existing customers, nor will it adversely affect other operators. Only the TT&C frequencies of AMC-18 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 83° W.L., all AMC-18 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-18 license to permit SES to relocate the satellite to 83° W.L.

Respectfully submitted,

SES AMERICOM, INC.

By: */s/ Petra A. Vorwig*

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