

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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-MOD-_____
	)	Call Sign S2433
Application for Modification of AMC-11	)	
Fixed-Satellite Space Station License	)	

APPLICATION OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) respectfully requests a modification of its license for the AMC-11 C-band fixed-satellite space station to permit relocation of the satellite from 131° W.L., where AMC-11 has been replaced by SES-21, to 111.1° W.L. SES and Telesat Canada (“Telesat”) have entered an agreement to assign the AMC-11 license to Telesat for operations at 111.1° W.L., and the parties are preparing an application for Commission consent to that assignment. Grant of the instant modification will serve the public interest by permitting redeployment of AMC-11 to supplement the C-band capacity currently being provided by Telesat’s Anik F2 spacecraft at 111.1° W.L.,¹ supporting service continuity for customers at that location.

The drift of AMC-11 is scheduled to begin on December 15, 2022, following transfer of traffic from AMC-11 to SES-21.² During the drift, SES earth stations will provide Telemetry, Tracking and Command (“TT&C”) using the following frequencies: 3700.5 MHz and 4199.50 MHz (downlink) and 6423.5 MHz (uplink).

¹ *Telesat Spectrum Corporation*, Call Sign S2472, File No. SAT-PDR-20020321-00027, granted Dec. 18, 2002.

² Given the time-sensitive nature of the relocation, SES is simultaneously filing a request for Special Temporary Authority to permit the move pending action on the instant modification.

A completed FCC Form 312, Schedule S, and Technical Appendix describing the changes associated with this relocation are attached. SES incorporates by reference the technical information previously provided in support of AMC-11³ and certifies pursuant to Section 25.117(c) of the Commission's rules that apart from the matters addressed in this modification application, that prior information remains unchanged.

Request for Authority to Relocate AMC-11 to 111.1° W.L.

AMC-11 is a U.S.-licensed C-band satellite that is located at 131° W.L., with a license term that expires March 1, 2026.⁴ On October 4, 2022, SES launched the SES-21 replacement spacecraft that will provide C-band services from 131° W.L. SES-21 is currently undergoing in-orbit testing, and after the satellite arrives at 131° W.L., SES will transfer traffic from AMC-11 to SES-21. Once that process is complete, SES plans to begin drifting AMC-11 to 111.1° W.L. on December 15. Upon AMC-11's arrival, Telesat will use AMC-11 to supplement the C-band capacity currently provided by Anik F2 in order to meet customer demand at 111.1° W.L. AMC-11 will remain U.S.-licensed at 111.1° W.L. but will operate pursuant to Canadian International Telecommunication Union ("ITU") filings at the location.⁵

Relocation of AMC-11 to 111.1° W.L. will not affect service to existing SES customers, nor will it adversely affect other operators. Only the C-band TT&C frequencies of AMC-11 will be used during the drift, and SES will follow standard industry practices for

³ See File Nos. SAT-LOA-20020104-00002 & SAT-MOD-20190813-00074.

⁴ Call Sign S2433, File No. SAT-MOD-20190813-00074, granted Oct. 23, 2019 (the "AMC-11 License").

⁵ SES requests that the Commission consent to this use of AMC-11 to maintain Canadian ITU filings. In this regard, SES notes that 111.1° W.L. is identified as a Canadian C-band location pursuant to the Trilateral Agreement. See *Trilateral Arrangement Regarding Use of the Geostationary Orbit by Canada, Mexico, and the United States*, Public Notice, Mimeo No. 4406 (Sept. 2, 1988).

coordination of TT&C transmissions while the satellite is being relocated. As discussed in the attached Technical Appendix, AMC-11 will be positioned at 111.1° W.L. +/- 0.05 degrees, and SES and Telesat have developed a separation strategy to ensure safe operations of the satellites at that location.⁶

For the foregoing reasons, SES respectfully requests that the Commission grant a modification of the AMC-11 license to permit relocation of the satellite from 131° W.L. to 111.1° W.L.

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Daniel C.H. Mah

Of Counsel

Karis A. Hastings
SatCom Law LLC
6930 Carroll Avenue, Suite 720
Takoma Park, MD 20912-4499
Tel: (202) 599-0975

Daniel C.H. Mah
Vice President, Legal & Regulatory Affairs
SES Americom, Inc.
1129 20th Street, N.W., Suite 1000
Washington, D.C. 20036

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⁶ SES seeks continued application of the waiver of Section 25.283(c) granted in the AMC-11 License regarding residual oxidizer that will remain on AMC-11 at the end of the spacecraft's life. *See* AMC-11 License, Attachment to Grant at ¶ 3. Because the justification for this waiver is not affected by the proposed modification, continuation of the waiver is consistent with Commission precedent.