

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

|                                               |   |                         |
|-----------------------------------------------|---|-------------------------|
| In the Matter of                              | ) |                         |
|                                               | ) |                         |
| SES AMERICOM, INC.                            | ) | File Nos. SAT-MOD-_____ |
|                                               | ) | Call Sign S3097         |
| Application for Modification of SES-19        | ) |                         |
| Fixed-Satellite Service Space Station License | ) |                         |

**APPLICATION OF SES AMERICOM, INC.**

SES Americom, Inc. (“SES”) respectfully requests a modification of its license for the SES-19 C-band fixed-satellite service space station to permit use of additional C-band telemetry, telecommand and control (“TT&C”) frequencies: 6415-6425 MHz for Earth-to-space telecommand communications and 4190-4200 MHz for space-to-Earth telemetry communications.

Grant of the requested authority will serve the public interest by allowing SES to manage its C-band fleet in response to operational requirements and to better communicate with and control SES-19. SES incorporates by reference the information previously provided in support of SES-19,<sup>1</sup> and a completed Form 312, Schedule S, and Technical Appendix describing the changes associated with this modification are attached.<sup>2</sup> SES certifies pursuant to Section 25.117(c) of the Commission’s rules that apart from the matters addressed in this

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<sup>1</sup> *SES Americom, Inc.*, Call Sign S3097, File Nos. SAT-RPL-20210812-00100, granted March 4, 2022 (“SES-19 License”) & SAT-MOD-20230201-00012 (“SES-19 Fleet Management Notice”) (advising the Commission that SES intends to deploy SES-19 to 134.9° W.L., rather than to 103.05° W.L.).

<sup>2</sup> The attached technical materials describe operation of SES-19 at the 134.9° W.L. location specified in the SES-19 Fleet Management Notice.

modification application, the previously supplied information regarding SES-19 remains unchanged.

SES-19 is currently authorized to perform TT&C using the 6423.5 MHz (Earth-to-space) and 4197.25 MHz and 4199.5 MHz (space-to-Earth) frequencies. However, the spacecraft is capable of performing TT&C anywhere in the C-band spectrum. SES requests the flexibility to select specific SES-19 TT&C frequencies within the 6415-6425 MHz range for Earth-to-space telecommand communications and within the 4190-4200 MHz range for space-to-Earth telemetry communications.<sup>3</sup>

Grant of the requested flexibility will serve the public interest and is consistent with Commission precedent. SES-19 will be positioned at the same nominal orbital location as other SES spacecraft upon deployment, and over the course of its life, the satellite or satellites with which SES-19 is sharing a location may change. Allowing SES to adjust its TT&C frequencies within the specified ranges will enhance SES's ability to communicate and control the satellite and facilitate collocation of SES-19 with different satellites during its mission lifetime.

The Commission has previously authorized TT&C operations over a much wider range in order to make collocation with other satellites easier.<sup>4</sup> Grant of the flexibility SES seeks for SES-19 will serve a similar function.

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<sup>3</sup> These segments are at the edge of the C-band frequency range for which SES-19 is authorized and therefore comply with Section 25.202(g), 47 C.F.R § 25.202(g).

<sup>4</sup> See, e.g., *Space Logistics, LLC*, Call Sign S2990, File Nos. SAT-LOA-20170224-00021 & SAT-AMD-20190207-00008, granted June 20, 2019, Attachment to Grant at 1 & n.3 (permitting TT&C operations for Mission Extension Vehicle-1 across the full range of C-band and Ku-band frequencies on the satellite subject to coordination).

## CONCLUSION

For the foregoing reasons, SES respectfully requests a modification of the SES-19 License to permit SES to use the 6415-6425 MHz band for Earth-to-space telecommand communications and the 4190-4200 MHz band for space-to-Earth telemetry communications.

Respectfully submitted,

SES AMERICOM, INC.

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