

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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-MOD-_____
	)	Call Sign S2826
Application to Modify SES-2	)	
	)	

APPLICATION TO MODIFY AUTHORIZATION OF SES-2

SES Americom, Inc, (“SES”), pursuant to Section 25.117 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ hereby seeks modification of the authorization for SES-2 (S2826)² to allow for Ku-band coverage flexibility and a +/-0.1° east/west station-keeping box.³ No other change is being sought. Grant of the instant application is in the public interest because it will allow the SES-2 satellite to better meet changing customer demands.

In accordance with the Commission’s rules,⁴ this application has been filed electronically as an attachment to FCC Form 312. By this modification application, SES requests authority to change the pointing and therefore the coverage of SES-2’s Ku-band beam to better meet changing customer demands. Specifically, SES seeks limited flexibility to repoint the KRH, KRV, KTH and KTV beams on file with the Commission within the envelope defined by the red line in Figure 1, below, which provides a composite isoline of the 8 dB below peak contour of all prospective

¹ 47 C.F.R. § 25.117.

² See *SES Americom, Inc.*, ICFS File Nos. SAT-RPL-20110429-00082, SAT-AMD-20110613-00107 (granted Sep. 1, 2011) (“*SES-2 Authorization*”).

³ SES seeks a waiver of Section 25.210(j) of the Commission’s rules below.

⁴ 47 C.F.R. § 25.117(c).

pointings of the beams. All operations within this contour will be consistent with applicable Commission rules and coordination agreements.



Figure 1

SES also requests authority to operate SES-2 within a $\pm 0.1^\circ$ east/west station-keeping box.⁵ Accordingly, SES respectfully requests a waiver of Section 25.210(j) of the Commission's rules, which requires geostationary space stations to be "maintained within 0.05° of their

⁵ See Letter from Cynthia J. Grady, Assistant General Counsel, SES Americom, Inc., to Marlene H. Dortch, Secretary, FCC, ICFS File No. File No. SAT-MOD-20120315-00048 (July 7, 2026).

assigned orbital longitude in the east/west direction.”⁶ The Commission has previously waived this rule based on a finding that allowing an increased station keeping volume would “not adversely affect the operations of other spacecraft, and would conserve fuel for future operations.”⁷

Under Section 1.3 of the Commission’s rules, the Commission has authority to waive its rules “for good cause shown.”⁸ Good cause exists if “special circumstances warrant a deviation from the general rule and such deviation will serve the public interest” better than adherence to the general rule.⁹ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”¹⁰ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

⁶ 47 C.F.R. § 25.210(j).

⁷ See, e.g., *Application of Intelsat License LLC to Modify Authorization for Intelsat 902 (S2406)*, ICFS File No. SAT-MOD-20240430-00091, Stamp Grant ¶ 19 (granted June 26, 2024) (waiving Section 25.210(j) of the Commission’s rules); *Petition of Intelsat License LLC for Declaratory Ruling to Add HISPASAT 143W-1 to the Permitted Space Station List for Ku- and S-band Operations at 143° W.L.*, ICFS File No. SAT-PDR-20191205-00143, Stamp Grant ¶ 19 (granted Apr. 29, 2020) (waiving same because “operating HISPASAT 143W-1 at a $\pm 0.1^\circ$ station-keeping tolerance will have no adverse impact on other operators” and “will also allow Intelsat to conserve fuel and extend the life of HISPASAT 143W-1”); *Application of SES Americom, Inc. for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, ¶¶ 10-14 (2005) (agreeing with SES “that increasing the station-keeping volume of the Satcom SN4 spacecraft will not adversely affect the operations of other spacecraft, and would conserve fuel for future operations”).

⁸ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

⁹ *N.E. Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁰ *WAIT Radio*, 418 F.2d at 1159.

The present request for waiver fits squarely within Commission precedent. Increasing the SES-2 satellite's East/West tolerance would conserve fuel because the need for eccentricity maneuvers would be significantly reduced. The resulting fuel savings will maximize the use of the satellite and promote the continued efficient use of orbital resources. In addition, allowing a 0.1° station-keeping box would not adversely affect the operations of any other spacecraft. A list of the known operational satellites within $\pm 6^\circ$ of the 87.0° W.L. orbital location is provided in the table below:

Satellite Name	Orbital Location	Operator
Arsat-2	81.0° W.L.	ARSAT
Nimiq 4	82.0° W.L.	Telesat
Astranis Aero East	83.1° W.L.	Spacing Guild UK Limited
Astranis Aero West	83.1° W.L.	Spacing Guild UK Limited
Star One D1	84.0° W.L.	EMBRATEL
GALAXY 17	85.0° W.L.	Intelsat (SES)
XM-3	85.15° W.L.	XM Radio
XM-4	85.15° W.L.	XM Radio
SXM-8	85.15° W.L.	Sirius XM Radio
SXM-9	85.15° W.L.	Sirius XM Radio
FM-5	86.15° W.L.	Sirius XM Radio
SES-2	87.0° W.L.	SES
Tupac Katari 1	87.2° W.L.	Bolivian Space Agency
VIASAT-3	88.9° W.L.	ViaSat
GALAXY 36	89.0° W.L.	Intelsat (SES)
GALAXY 32	91.0° W.L.	Intelsat (SES)
INTELSAT 40E	91.0° W.L.	Intelsat (SES)
Nimiq 6	91.1° W.L.	Telesat
DBSD G1	92.85° W.L.	New DBSD Satellite Services

The operation of SES-2 with a 0.1° station-keeping box will have a negligible impact on the interference environment for adjacent satellites. SES's proposed operations will not cause any more interference or require any more protection than a satellite operating within a 0.05° station-keeping box and would, in any event, be operated consistent with all applicable coordination agreements and the Commission's rules governing operations vis-à-vis adjacent orbital locations.

Further, SES's operation of SES-2 with a $\pm 0.1^{\circ}$ station-keeping box will not affect the station-keeping of any other spacecraft. Increasing SES-2's station-keeping box to $\pm 0.1^{\circ}$ will not overlap with the station-keeping box of any other operational satellite. Finally, SES is not aware of any plans to deploy any other geostationary satellite $\pm 6^{\circ}$ from the SES-2 satellite at 87.0° W.L.

SES certifies that apart from the changes described in this Application, all other parameters of SES-2's operations remain unchanged from those authorized in the *SES-2 Authorization*. SES's proposed operations will conform to existing coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

For the reasons set forth above, SES respectfully requests that the Commission grant the modification requested herein.

SES AMERICOM, INC.

By: /s/ Hilary Rosenthal
Hilary Rosenthal
Legal Counsel

Dated: August 14, 2026