

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

In the Matter of)	
)	
SES-17 S.à r.l.)	File No. SAT-MPL-_____
)	Call Sign S3043
Petition to Modify U.S. Market Access for the SES-17 Space Station)	
)	

PETITION TO MODIFY U.S. MARKET ACCESS AUTHORIZATION

SES-17 S.à r.l. (“SES”) hereby respectfully requests a modification of its authority to serve the U.S. using the Luxembourg-licensed SES-17 Ka-band spacecraft¹ to reflect a change in one of the telemetry, tracking and control (“TT&C”) frequencies that will be used to control the satellite’s operations. Specifically, SES-17 will use 14007.0 MHz as one of its command frequencies rather than the 14005.0 MHz frequency previously identified. Apart from this minor frequency shift, SES is not proposing any changes to the TT&C system’s operating parameters as described in the SES-17 Petition,² and the shift will not adversely affect other operators. In issuing the SES-17 Grant, the Commission waived Section 25.202(g) to permit use of Ku-band frequencies for TT&C operations,³ and the same waiver should be extended to the 14007.0 MHz command carrier proposed here. Grant of the requested authority will serve the public interest by ensuring that SES can use the TT&C system as configured on the satellite to control SES-17’s operations.

¹ See *SES-17 S.à r.l.*, File No. SAT-PDR-20190305-00014 (“SES-17 Petition”), granted May 8, 2020 (the “SES-17 Grant”).

² See SES-17 Petition, Technical Appendix at 3, Section 3.0.

³ See SES-17 Grant, Attachment to Grant at 4, paragraph 16; *see also* SES-17 Petition, Legal Narrative at 10-11.

A completed FCC Form 312 is attached, and SES incorporates by reference the information supplied in the SES-17 Petition. An updated Schedule S that reflects the proposed frequency change is also provided. SES certifies that apart from the matters addressed herein, no change is proposed to the information previously provided with respect to SES-17.

Grant of the requested authority to change one of the command frequencies from 14005.0 MHz to 14007.0 MHz is consistent with Commission precedent. 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.⁴

Here, the proposed change will allow SES to reliably control the SES-17 spacecraft to support service to customers.

⁴ *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316, 12318, ¶ 8 (IB 1998) (footnote omitted).

For the foregoing reasons, SES seeks a modification of the SES-17 Grant to reflect a change in one of the TT&C frequencies from 14005.0 to 14007.0 MHz.

Respectfully submitted,

SES-17 S.à r.l.

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Dated: June 9, 2020