

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
EMBRATEL TVSAT)	File No. SAT-MOD-_____
TELECOMUNICAÇÕES S.A.)	Call Sign S2678
)	
Fleet Management Notice to Modify Star One)	
C2 Fixed-Satellite Space Station License)	

**FLEET MANAGEMENT NOTICE OF
EMBRATEL TVSAT TELECOMUNICAÇÕES S.A.**

Embratel TVSAT Telecomunicações S.A. (“Embratel”) respectfully submits this notification pursuant to the Commission’s fleet management procedures to modify the Star One C2 fixed-satellite space station license to relocate the satellite from 70° W.L. to 65° W.L. A completed Form 312 is attached. In addition, Embratel is providing below a certification in support of this notification, as required by Section 25.118(e) of the Commission’s rules, 47 C.F.R. § 25.118(e).

BACKGROUND

Embratel currently operates the Star One C2 satellite in the conventional Ku-band at 70° W.L.¹ Embratel operates Star One C1 at 65° W.L.² Star One C1 operates in the conventional C- and Ku-bands.

¹ Star One S.A., File No. SAT-PPL-20050708-00144, Call Sign S2678 (granted Sep. 9, 2005); *see* Star One S.A., File No. SAT-MPL-20210302-00027, Call Sign S2678 (granted July 16, 2021) (granting *pro forma* transfer of Star One C2 from Star One S.A. to Embratel).

² Star One S.A., File No. SAT-PPL-20050706-00143, Call Sign S2677 (granted Mar. 29, 2006); *see* Star One S.A., File No. SAT-MPL-20210302-00026, Call Sign S2677 (granted July 16, 2021) (granting *pro forma* transfer of Star One C1 from Star One S.A. to Embratel).

Embratel proposes to relocate Star One C2 from 70° W.L. to 65° W.L., where it will replace Star One C1.³ Star One C1 is approaching its end of life and is in the process of being deorbited.⁴ Star One C2 will operate within the technical parameters currently licensed and coordinated for Star One C1, which operations will be provided only in the conventional Ku-band. Coverage contours for Star One C2 at the new orbital location are provided in Attachment 1. Replacing Star One C1 with Star One C2 at will allow Embratel to continue serving customers from the 65° W.L. location and to manage its fleet efficiently.

CERTIFICATION OF COMPLIANCE WITH SECTION 25.118(e)

Embratel hereby certifies that this fleet management notice complies with the requirements of Section 25.118(e), as indicated below:

- (1) Star One C2 will be located to 65° W.L., an orbital location assigned to Embratel.
- (2) After relocation, Star One C2 will be operated within the technical parameters authorized and coordinated for the Star One C1 satellite at 65° W.L.
- (3) Embratel certifies that it will operate Star One C2 at 65° W.L. in compliance with all of the conditions imposed on the operation of Star One C1 at the same orbital location.
- (4) Embratel certifies that it will limit operations of Star One C2 to TT&C functions during the relocation and satellite drift transition period.
- (5) Embratel certifies that:
 - (i) It has assessed and limited the probability of Star One C2 becoming a source of debris as a result of collisions with large debris or other operational satellites at 65° W.L.; and
 - (ii) The proposed station-keeping volume of Star One C2 following relocation will not overlap a station-keeping volume reasonably expected to be occupied by any non-Embratel satellite, including those authorized by the Commission, applied for

³ Embratel will submit shortly a separate application requesting market access for its Star One C4 satellite at 70° W.L.

⁴ Embratel will submit a separate submission notifying the Commission of the removal of Star One C1 from the Commission's Permitted List.

and pending before the Commission, or otherwise the subject of an ITU filing and either in orbit or progressing towards launch. Embratel will internally manage the collocation of its satellites at this location.

- (6) Embratel certifies that the relocation of Star One C2 will not result in a lapse of service for any current customer.
- (7) Not applicable.
- (8) Not applicable.

* * * * *

Pursuant to the Commission's fleet management policies and as described herein, Embratel notifies the Commission that it intends to relocate Star One C2 from 70° W.L. to 65° W.L., commencing no earlier than 30 days following submission of this notification.

Respectfully submitted,

Embratel TVSAT Telecomunicações S.A.

By: /s/Luiz Otavio Prates

Luiz Otavio Prates
Regulatory Manager

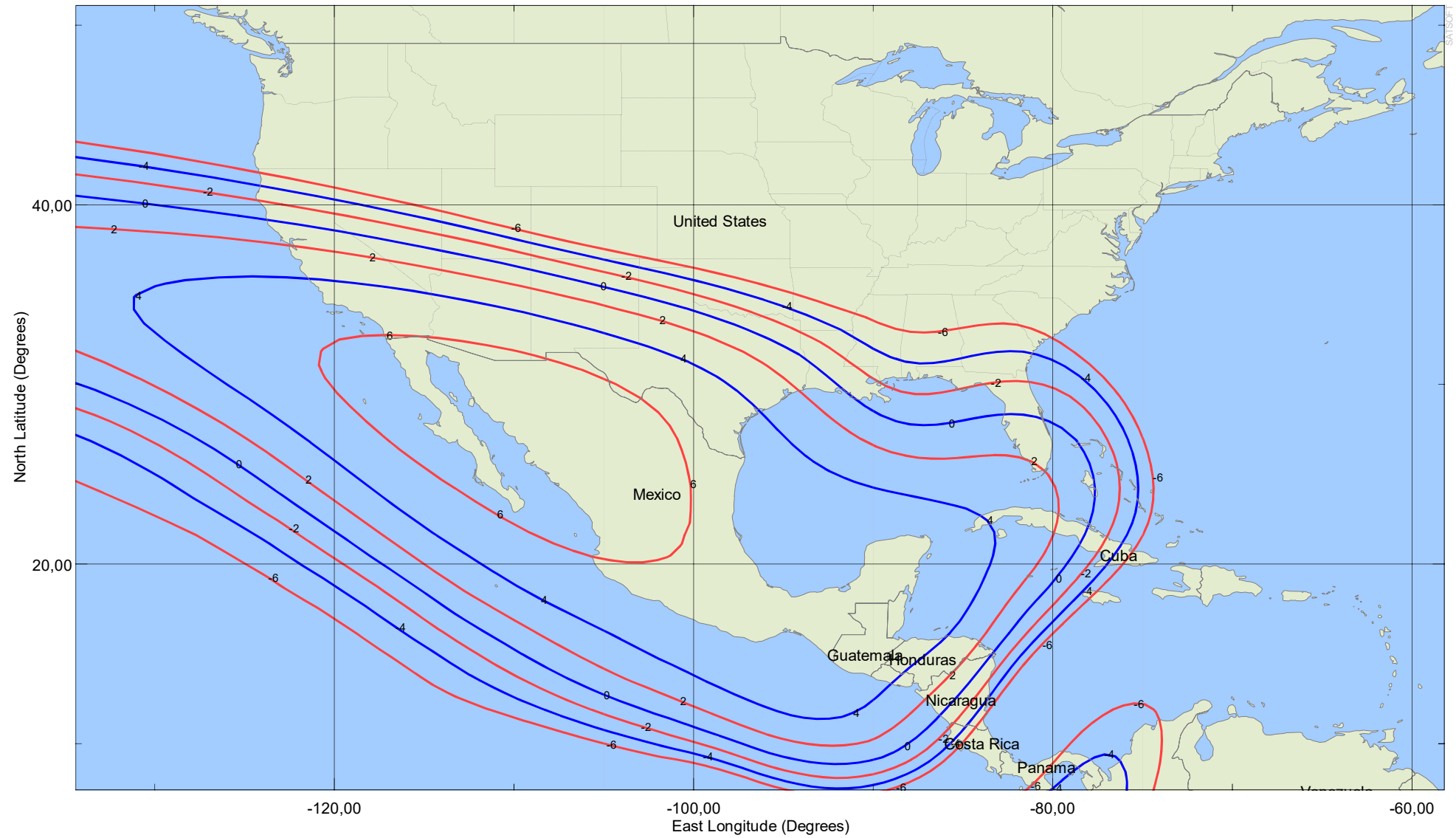
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August 24, 2021

ATTACHMENT 1

STAR ONE C2 @ 65W
MMK - MIAMI AND MEXICO KU BAND - GoT (dB/K)



STAR ONE C2 @ 65W
MMK - MIAMI AND MEXICO KU BAND - EIRP (dBW)

