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FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: SES Americom, Inc., IBFS File No. SAT-PDR-20070129-00024, Call Sign S2731
Surrender of Authorization**

Dear Ms. Dortch:

SES Americom, Inc. ("SES"), by its attorney, hereby surrenders its above-referenced U.S. market access authorization for AMC-20, a Direct Broadcast Satellite ("DBS") service spacecraft intended for operation at 105.5° W.L.¹ After substantial commercial efforts, SES has concluded that the business case does not support proceeding with construction and launch of AMC-20 at this time in accordance with the schedule established in the AMC-20 Order.

This surrender does not reflect any lack of interest on the part of SES in expanding competition in the DBS market through the implementation of new satellites at less than nine degree orbital spacing. As the Commission is aware, SES was the first to propose such a "tweener" spacecraft when it initially filed in April 2002 for DBS operations at this location using the planned AMC-14 satellite.² During the more than four and a half year period that the AMC-14 Petition was pending, SES constructed AMC-14 at its own risk, but had to repurpose the spacecraft³ given the delay in action on the AMC-14 Petition and uncertainty regarding the broader regulatory issues surrounding DBS operations at reduced spacing.⁴

¹ See *SES Americom, Inc.*, Order, 28 FCC Rcd 236 (Sat. Div. 2013) ("AMC-20 Order").

² *SES Americom, Inc.*, Petition for Declaratory Ruling to Serve the U.S. Market Using BSS Spectrum from the 105.5° W.L. Orbital Location, File Nos. SAT-PDR-20020425-00071, SAT-AMD-20051116-00219 & SAT-AMD-20060120-00006, Call Sign S2619 (the "AMC-14 Petition").

³ See *EchoStar Corporation*, File No. SAT-LOA-20071221-00183, Call Sign S2746, grant-stamped March 12, 2008 (authorizing EchoStar to launch and operate AMC-14 as a DBS satellite at 61.5° W.L. pursuant to an agreement with SES). AMC-14 suffered a launch vehicle anomaly and was never placed into service.

⁴ In August 2006, the Commission initiated a rulemaking proceeding regarding DBS licensing that includes consideration of issues relating to DBS operations at reduced orbital spacing. See *Amendment of the Commission's Policies and Rules for Processing Applications in the Direct*

Following dismissal of the AMC-14 Petition without prejudice on narrow technical grounds, SES re-submitted its request for DBS market access at 105.5° W.L., with the understanding that a new spacecraft, AMC-20, would need to be constructed.⁵ This time, six years elapsed before the AMC-20 Order was issued in January of last year.

Following the grant, SES undertook significant efforts to explore the commercial feasibility of building and launching a satellite consistent with the terms of the AMC-20 Order. However, based on a number of factors, including the lack of regulatory clarity resulting from the continued pendency of the Reduced Spacing NPRM and uncertainty in coordination, SES has made the business decision to surrender the AMC-20 authorization.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Karis A. Hastings

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cc: Stephen Duall

Broadcast Satellite Service, Feasibility of Reduced Orbital Spacing for Provision of Direct Broadcast Satellite Service in the United States, Notice of Proposed Rulemaking, 21 FCC Rcd 9443 (2006) ("Reduced Spacing NPRM"). No decision has yet been made in the rulemaking proceeding.

⁵ SES Americom, Inc., Petition for Declaratory Ruling to Serve the U.S. Market Using BSS Spectrum from the 105.5° W.L. Orbital Location, File No. SAT-PDR-20070129-00024, Call Sign S2731, Narrative at 2.