

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

In the Matter of)
)
STAR ONE S.A.) File Nos. SAT-PPL-20081205-00225 (Call Sign S2784)
) & SAT-PPL-20071113-00159 (Call Sign S2742)
Petition for Declaratory Ruling to be)
Added to the Permitted List)

COMMENTS OF SES AMERICOM, INC.

SES Americom, Inc. (“SES Americom,” doing business as “SES WORLD SKIES”¹), by its attorneys, hereby comments on the Application for Review of the International Bureau’s Order² filed by Star One S.A. (“Star One”) in the above-captioned proceedings (the “Star One Application for Review”).³

SES WORLD SKIES does not oppose the relief requested by Star One. However, SES WORLD SKIES strongly objects to Star One’s characterization of its deployment of the AMC-4 spacecraft at 67° W.L. Star One appears to suggest that the relocation of AMC-4 to 67° W.L. “is not intended to provide commercial service”⁴ but rather is to enable spectrum to be

¹ SES WORLD SKIES is the commercial brand name for the integrated operations of two indirect subsidiaries of SES S.A.: SES Americom and New Skies Satellites B.V. (effective January 1, 2009). The brand name does not affect the underlying legal entities that hold Commission authorizations or U.S. market access rights.

² *Star One S.A.*, Order, DA 10-1957 (IB rel. Oct. 13, 2010) (the “*C5 Order*”).

³ Star One challenges the rulings in the *C5 Order* denying Star One’s request to modify the Permitted Space Station List entry for Star One C5 at 68° W.L. by substituting the in-orbit Star One B1 satellite and declaring Star One’s bond for C5 due and payable to the U.S. Treasury. Star One Application for Review at 1.

⁴ *Id.* at 15.

“warehouse[d].”⁵ To the contrary, SES WORLD SKIES is commercializing the Ku-band frequencies at 67° W.L. through its arrangement with the Andean Community. In fact, during the short period since the Commission granted regular authority for AMC-4’s operations earlier this month, SES WORLD SKIES has signed multiple contracts for AMC-4 Ku-band capacity at 67° W.L. and has begun providing service. Thus, any suggestion by Star One that SES WORLD SKIES is engaged in spectrum warehousing or does not intend to provide commercial service in the Ku-band using AMC-4⁶ is simply wrong.

Respectfully submitted,

SES AMERICOM, INC.

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November 29, 2010

⁵ *Id.* at 18.

⁶ *See id.* at 10, 15, & 18.

CERTIFICATE OF SERVICE

I, Cecelia Burnett, hereby certify that on this 29th day of November, 2010, I caused to be served a copy of the foregoing “Comments of SES Americom, Inc.” on the following parties by first-class U.S. mail, postage prepaid, except as otherwise indicated:

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