

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
SES Americom, Inc.)	File No. SAT-PPL-20180815-00062
)	Call Sign S3037
Request to Add NSS-11 to the Permitted)	
Space Station List for Ku-band Operations)	

REPLY OF EUTELSAT S.A.

Eutelsat S.A. (“Eutelsat”) replies to the response of SES Americom, Inc. (“SES”)¹ to Eutelsat’s comments² on the above-referenced petition in which SES seeks authority for the NSS-11 satellite to serve the U.S. market.³

The SES Response clarifies that the NSS-11 Petition should have sought U.S. market access in the 12.25-12.75 GHz band rather than inclusion of the satellite on the Permitted Space Station List.⁴ As requested by Eutelsat, it also provides a more comprehensive compatibility analysis with respect to the operations of EUTELSAT 174A.⁵ Eutelsat appreciates this supplemental information and believes the SES Response adequately addresses these issues.

The bulk of the SES Response challenges Eutelsat’s understanding that use of the 12.7-12.75 GHz band segment in the United States is limited to mobility services. As discussed in the Eutelsat Comments, this understanding is based on the licensing history of EUTELSAT 172B,

¹ See Response of SES Americom, Inc., File No. SAT-PPL-20180815-00062, Call Sign S3037 (filed Dec. 4, 2018) (the “SES Response”).

² See Comments of Eutelsat S.A., File No. SAT-PPL-20180815-00062, Call Sign S3037 (filed Nov. 19, 2018) (the “Eutelsat Comments”).

³ See SES Americom, Inc., File No. SAT-PPL-20180815-00062, Call Sign S3037 (filed Aug. 15, 2018) (the “NSS-11 Petition”).

⁴ SES Response at 3-4.

⁵ *Id.* at 4.

including Eutelsat’s commitment to limit use of that spectrum to mobility operations and Commission grant of the Petition for Clarification or Reconsideration of License Conditions relating to use of the 12.7-12.75 GHz band segment.⁶

Eutelsat acknowledges that there is no specific limitation on use of the 12.7-12.75 GHz band segment in the reissued EUTELSAT 172B grant despite the notion that Eutelsat would use the band for mobility applications.⁷ As suggested in the Eutelsat Petition, such a use limitation minimizes the potential for interference and possible end-user claims for protection of earth station receivers from terrestrial transmissions. Eutelsat further acknowledges, however, that such a limitation may have been considered unnecessary because operations in this spectrum must be authorized pursuant to earth station-specific licensing.⁸ Therefore, the Commission would have an opportunity to consider and rule on each earth station request to communicate with NSS-11 in the band.

Nonetheless, considering the non-conforming status of satellite downlink operations, additional guidance regarding use of the 12.7-12.75 GHz band segment in United States would be helpful to satellite operators and earth station applicants alike. If the Commission does not provide such guidance in granting the NSS-11 Petition, then it will have an opportunity to do so

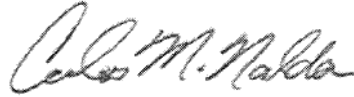
⁶ See Eutelsat Comments at 3-4; *see also* ES 172 LLC, Petition for Clarification or Reconsideration of License Conditions, and Request for Stay, File No. SAT-RPL-20170927-00136, Call Sign S3021 (September 5, 2018) (“Eutelsat Petition”).

⁷ See ES 172 LLC, Satellite Space Station Authorization, File No. SAT-RPL-20170927-00136, Call Sign S3021 (reissued Sept. 5, 2018). Of course, the absence of such a limitation may well be because Commission license grants are limited by the representations made in underlying applications and related submissions. *See, e.g.*, SES Americom, Inc., File No. SAT-MOD-20170518-00073, Call Sign S2135 (granted June 31, 2017) at Attachment to Grant, p. 1 (in granting the AMC-4 satellite license, as it does in the ordinary course, the Commission incorporated the contents of the underlying application into the grant: “... operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner....”).

⁸ See SES Response at 3 (acknowledging that the NSS-11 Petition should have stated that SES was seeking U.S. market access, rather than inclusion on the Permitted Space Station List).

in each earth station application seeking to add NSS-11 as an authorized point of communication in these frequencies.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos M. Nalda". The signature is fluid and cursive, with the first name "Carlos" being the most prominent.

Carlos M. Nalda
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On behalf of Eutelsat S.A.

December 14, 2018

CERTIFICATE OF SERVICE

I, Jennifer White, do hereby certify that on December 14, 2018, I served a true and correct copy of this Reply of Eutelsat S.A. by first-class mail on the following:

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