



File # SAT-STA-20050316-00065  
*with attached conditions*

Call Sign SEY15 Grant Date March 31, 2005  
(or other identifier)

Approved by OMB  
3060-0678

From 4/1/2005 Term Dates To: 6/1/2005

Approved: MG Chicks delite  
Robert G. Nelson Engineering Branch

Date & Time Filed: Mar 16 2005 3:55:35:430PM  
File Number: SAT-STA-20050316-00065  
Callsign:

FEDERAL COMMUNICATIONS COMMISSION  
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY

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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
AMC-12 STA at 37.45 W.L.

I. Applicant

<b>Name:</b>	Columbia Communications Corporation	<b>Phone Number:</b>	609-987-4000 x4448
<b>DBA Name:</b>		<b>Fax Number:</b>	609-987-4233
<b>Street:</b>	4 Research Way	<b>E-Mail:</b>	nancy.eskenazi@ses-americom.com
<b>City:</b>	Princeton	<b>State:</b>	NJ
<b>Country:</b>	USA	<b>Zipcode:</b>	08540
<b>Attention:</b>	Ms. Nancy J. Eskenazi		

**Attachment**  
**Conditions of Authorization – SAT-STA-20050316-00065**  
**Call Sign S2415**  
**March 31, 2005**

1. Columbia Communications Corporation's (Columbia's) application, File No. SAT-STA-20050316-00065, for Special Temporary Authority IS GRANTED and Columbia is authorized to operate the AMC-12 satellite, Call Sign S2415, at the 37.45° W.L. orbital position in the 3700 – 4200 MHz (space-to-Earth), 5925 – 6425 MHz (Earth-to-space), frequency bands for a period of 60 days commencing on April 1, 2005, in accordance with the terms, conditions, and technical specifications set forth in its application, this Attachment, and the Federal Communications Commission's Rules.
2. This grant of special temporary authority is necessitated by the following circumstances: (1) the AMC-12 satellite is currently drifting to the 37.5° W.L. orbital position pursuant to previously granted authority and is scheduled to arrive at the 37.5° W.L. orbital position by April 3, 2005; and (2) temporary operations at 37.45° W.L. will facilitate the transition and continuity of service from satellites at the nominal 37.5° W.L. orbital position.
3. No harmful interference shall be caused by AMC-12 to any other lawfully operating in-orbit satellite and operations of the AMC-12 satellite shall cease immediately upon notification of such interference.
4. Columbia is required to accept interference from other lawfully operating in-orbit satellites.
5. This Special Temporary Authority is granted without prejudice to our final determination of Columbia's modification request SAT-MOD-20050325-00077 for regular operational authority at 37.45° W.L.
6. This special temporary authority is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.

2. Contact	
<b>Name:</b> Karis Hastings	<b>Phone Number:</b> 202-637-5767
<b>Company:</b> Hogan & Hartson L.L.P.	<b>Fax Number:</b> 202-637-5910
<b>Street:</b> 555 13th Street, N.W.	<b>E-Mail:</b> kahastings@hhlaw.com
<b>City:</b> Washington	<b>State:</b> DC
<b>Country:</b> USA	<b>Zipcode:</b> 20004 -1109
<b>Contact Title:</b>	<b>Relationship:</b> Legal Counsel
(If your application is related to an application filed with the Commission, enter the file number below.)	
3. Reference File Number	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other(please explain):	
4b. Fee Classification    CRY – Space Station (Geostationary)	
5. Type Request	
<input checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> Other	
6. Temporary Orbit Location 37.45 W.L.	7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Columbia Communications Corporation seeks special temporary authority to relocate and operate the AMC-12 spacecraft at 37.45 degrees W.L.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.  Yes  No

10. Name of Person Signing  
Nancy J. Eskenazi

11. Title of Person Signing  
Assistant Secretary

12. Please supply any need attachments.

Attachment 1: Att.1	Attachment 2:	Attachment 3:
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WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

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

In the Matter of Application by )  
 )  
COLUMBIA COMMUNICATIONS CORP. ) File No. SAT-STA-\_\_\_\_\_  
 )  
For Special Temporary Authority to )  
Operate AMC-12 at 37.45° W.L. )

*EXPEDITED ACTION REQUESTED*

**APPLICATION OF COLUMBIA COMMUNICATIONS CORPORATION**

Columbia Communications Corporation ("Columbia") hereby respectfully requests special temporary authority for a period of sixty days to relocate AMC-12 to 37.45° W.L. and operate the spacecraft at that location. Columbia is separately filing an application for modification of the AMC-12 license to assign the spacecraft to the 37.45° W.L. orbital position. Columbia seeks to operate at a slight offset from the 37.5° W.L. orbital position originally assigned to AMC-12 in order to effectuate an agreement on stationkeeping coordination with Loral Skynet, whose Telstar 11 spacecraft is also assigned to the 37.5° W.L. nominal orbital location. Grant of the instant request will serve the public interest.

AMC-12 is a C-band satellite that was launched on February 2, 2005, and is licensed to operate at the 37.5° W.L. orbital position.<sup>1</sup> AMC-12 recently

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<sup>1</sup> See *Columbia Communications Corporation, Order and Authorization*, DA 05-244 (Sat. Div. rel. Jan. 28, 2005) (the "AMC-12 Order").

completed testing at 67.5° W.L., and Columbia is preparing to drift the satellite to its assigned orbital location.

Columbia's parent, SES Americom, Inc., is currently providing C-band service at 37.5° W.L. using its Satcom C-1 spacecraft.<sup>2</sup> Satcom C-1 is collocated with Loral Skynet's Telstar 11, and the two spacecraft have been flying in formation to permit sharing of the same stationkeeping volume (37.5° W.L. +/- 0.05 degrees). This arrangement has worked successfully, but requires a high degree of collaboration on the part of the two operators and an increased number of maneuvers to maintain an appropriate separation between the spacecraft.

In order to simplify stationkeeping on a going forward basis, Columbia and Loral Skynet have conducted discussions regarding operation of AMC-12 and Telstar 11 at offsets from the 37.5° W.L. nominal orbital position. As a result of those discussions, Columbia has agreed to seek authority to operate AMC-12 centered at 37.45° W.L. with +/- 0.05 degree East/West stationkeeping, and Loral Skynet has agreed to seek authority to operate Telstar 11 at 37.55° W.L. +/- 0.05 degrees. This arrangement will eliminate any overlap of the stationkeeping volumes of the two spacecraft, thereby facilitating joint operations.

Grant of the requested authority will not adversely affect any other operators. The adjacent C-band satellites to AMC-12's assigned location are New Skies 806 at 40.5° W.L. and Intelsat 903 at 34.5° W.L., each with 3° separation from

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<sup>2</sup> See AMC-12 Order at ¶ 16.

37.5° W.L. Although the proposed offset would result in AMC-12 being slightly closer to Intelsat 903, the satellites will still be spaced 2.95 degrees apart, and there will be no material change to the existing interference environment.<sup>3</sup> AMC-12 is fully compliant with the Commission's requirements with respect to operation at two-degree spacing.<sup>4</sup>

Columbia incorporates by reference herein the technical information it has already provided with respect to AMC-12.<sup>5</sup> In particular, Columbia provided an interference analysis with its amendment to demonstrate that operation of AMC-12 was compatible with the adjacent satellites at 37.5° W.L. with the existing three-degree spacing or assuming two-degree spacing.<sup>6</sup> Columbia is not submitting new contour maps with the instant application because the proposed shift in orbital location will not materially affect coverage of the spacecraft as shown on the maps already on file.

Columbia hereby certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. Columbia waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the

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<sup>3</sup> Columbia has calculated that implementation of the proposed offset would result in a change of less than 0.18 dB in the interference environment of two-degree compliant earth stations communicating with Intelsat 903.

<sup>4</sup> See *AMC-12 Order* at ¶¶ 8-10.

<sup>5</sup> See File Nos. SAT-MOD-20020517-00078 & SAT-AMD-20040826-00161.

<sup>6</sup> See File No. SAT-AMD-20040826-00161, Narrative at 2-4 & Tables 1-4.



United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.

For the foregoing reasons, Columbia seeks authority for a period of sixty days to relocate AMC-12 to 37.45° W.L. and operate the spacecraft at that location. Columbia requests expedited action on this application.

Respectfully submitted,

COLUMBIA COMMUNICATIONS CORP.

By: */s/ Nancy J. Eskenazi*

Nancy J. Eskenazi  
Assistant Secretary  
Columbia Communications Corp.  
Four Research Way  
Princeton, NJ 08540

Of Counsel

Peter A. Rohrbach  
Karis A. Hastings  
Hogan & Hartson L.L.P.  
Washington, D.C. 20004-1109  
Tel: (202) 637-5600  
Fax: (202) 637-5910

Dated: March 16, 2005

# HOGAN & HARTSON

L.L.P.

PETER A. ROHRBACH  
PARTNER  
(202) 637-8631  
PAROHRBACH@HHLAW.COM

March 25, 2005

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 657-5600  
FAX (202) 657-5910  
WWW.HHLAW.COM

*BY HAND DELIVERY*

**FILE STAMP COPY**

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

**RECEIVED**

MAR 25 2005

Federal Communications Commission  
Office of Secretary

Re: STA Request to Operate AMC-12 at 37.45° W.L.  
File No. SAT-STA-20050316-00065, Call Sign S2415

Dear Ms. Dortch:

Columbia Communications Corporation ("Columbia"), by its attorneys, hereby supplements the record with respect to its above-referenced application for special temporary authority to operate AMC-12 at 37.45° W.L. rather than its assigned orbit location of 37.5° W.L. AMC-12 is currently drifting towards 37.5° W.L. and is scheduled to arrive there on April 3. For the reasons discussed herein, Columbia seeks expedited grant of its STA request prior to that date.

AMC-12 will provide follow-on C-band capacity for Satcom C-1, which is licensed to Columbia's parent company, SES Americom, Inc. ("SES Americom"). There is only a single customer that will transition from Satcom C-1 to AMC-12. Columbia and SES Americom are currently working with that customer to develop a transition plan. The transition is not a simple "hot cut" because the customer will not be remaining on the same frequency. The most likely scenario is that Columbia will turn on and configure all of AMC-12 except for the frequency the Satcom C-1 customer is currently using. When the customer transitions over to its new frequency on AMC-12, SES Americom will terminate communications services over Satcom C-1, and Columbia will activate the remaining frequencies on AMC-12. This process may occur over several days, between approximately April 5 and April 7.

Satcom C-1 is currently collocated at 37.5° W.L. with Loral's Telstar 11 Ku-band spacecraft. Both Satcom C-1 and Telstar 11 are in inclined orbit. The motion of these spacecraft occupies a large amount of the stationkeeping volume at 37.5° W.L. However, currently the motion is somewhat synchronized, and the

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NEW YORK BALTIMORE McLEAN MIAMI DENVER BOULDER COLORADO SPRINGS LOS ANGELES

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HOGAN & HARTSON L.L.P.

Ms. Marlene H. Dortch

March 25, 2005

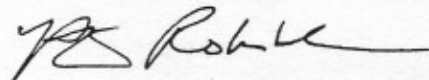
Page 2

operators have been maintaining separation of the two by eccentricity. Bringing a fully stationkept satellite into that same area presents a risk to safe operation of the satellites because the new spacecraft would not have the same daily motion in the box that the two inclined spacecraft do. Thus, what is currently a difficult task of maintaining two inclined orbit satellites in the same stationkeeping volume will become much more complicated if AMC-12 must also share the same volume when it arrives.

Service to customers could also be adversely affected. A high eccentricity would be required to maintain separation of AMC-12 from the other satellites. The eccentricity would not affect the video service customer currently using Satcom C-1 but could impact the performance of smaller signal customers that are expected to use capacity on AMC-12.

To avoid these risks, Columbia urges the Commission to grant the AMC-12 STA request and Loral's pending request to operate Telstar 11 at 37.55° W.L. (File No. SAT-STA-20050321-00067) on an expedited basis. Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,



Peter A. Rohrbach  
Karis A. Hastings  
Counsel for Columbia Communications Corp.

cc: Fern Jarmulnek  
Andrea Kelly  
Robert Nelson