

Approved by OMB  
3060-0678

Date & Time Filed: Aug 19 2005 5:27:22:663PM

File Number: SAT-MOD-20050819-00163

Call Sign: S2347

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

AMC-6 modification to add extended Ku-Band and revise coverage (8/2005)

1-8. Legal Name of Applicant

<b>Name:</b>	SES Americom, Inc.	<b>Phone Number:</b>	609-987-4000 x4187
<b>DBA Name:</b>		<b>Fax Number:</b>	609-987-4233
<b>Street:</b>	4 Research Way	<b>E-Mail:</b>	nancy.eskenazi@ses-amicom.com
<b>City:</b>	Princeton	<b>State:</b>	NJ
<b>Country:</b>	USA	<b>Zipcode:</b>	08540 -
<b>Attention:</b>	Ms. Nancy J. Eskenazi		

See also:  
SAT STA-20050819-00164  
Dismissed as moot.

1



File # SAT-MOD-2005-0819-00163

Call Sign S2347 Grant Date 10/26/05  
(or other identifier)

Term Dates + 15 years  
From launching To: see original case.

Approved: [Signature]

Policy Branch Chief  
w/ conditions

## ATTACHMENT

### AMC-6

File Nos. SAT-MOD-20050819-00163

SAT-STA-20050819-00164

Call Sign: S2347

October 26, 2005

SES AMERICOM Inc.'s (SES Americom) request, IBFS No. SAT-MOD-20050610-00121,<sup>1</sup> to modify its existing authorization<sup>2</sup> to operate the in-orbit Fixed Satellite Service (FSS) Hybrid C- and Ku-band AMC-6 satellite (Call Sign: S2347) at 72° W.L.<sup>3</sup> to add authority to operate the spacecraft's extended Ku-band payload and to permit service to South America<sup>4</sup> in the conventional Ku-band and the extended Ku-band IS GRANTED. Accordingly, SES Americom is authorized to operate the AMC-6 satellite at 72° W.L. orbital location in order to provide service South America in the standard Ku-bands; 14.0-14.5 GHz (Earth-to-space), 11.7-12.2 GHz (space-to-Earth), and in the extended Ku-bands; 11.45-11.7 GHz (space-to-Earth), and 13.75-14.0 GHz (Earth-to-space), in accordance with the terms, conditions, and technical specifications set forth in its application, this Attachment and the Federal Communications Commission's (Commission) Rules. This is in addition to SES Americom's continuing authority to operate in the C-band, 5.925-6.425 GHz, (Earth-to-space) and 3.700-4.200 GHz (space-to-Earth), as well as in the Ku-band, 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth). The conditions of SES Americom's existing authorization otherwise remain unchanged.

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<sup>1</sup> See SES AMERICOM Inc. Application to Modify Authorization, File No. SAT-MOD-20050819-00163, (filed August 19, 2005) (SES Americom AMC-6 Application). The application was placed on Public Notice on September 9, 2005. See *Public Notice*, Policy Branch Information, Report No. SAT-00319 (September 9, 2005). No comments were filed.

<sup>2</sup> SES Americom was originally granted authority to launch and operate the hybrid C-/Ku-band AMC-6 satellite (previously called GE-6) in 2000. See Application of GE American Communications, Inc., For Authority to Launch and Operate a Replacement C/Ku Hybrid Fixed Satellite Service Space Station at 72° W.L., *Memorandum Opinion, Order and Authorization*, 15 FCC Rcd 19671 (Sat. & Radiocomm. Div. 2000). Although the spacecraft was constructed and launched with an extended Ku-band payload, SES Americom did not seek and was not granted authority to operate the extended Ku-band payload. Thus, SES Americom authority was limited to operations in the standard C- and Ku-bands and to coverage of Contiguous United States (CONUS), Puerto Rico, the Virgin Islands, Canada, and Mexico. See SES AMERICOM AMC-6 Application, Narrative at 1-2.

<sup>3</sup> The closest Ku-band spacecraft to 72° W.L. are Nahuel 1 at 71.8° W.L. and PanAmSat's SBS-6 at 74.05° W.L. and Galaxy 3R at 73.95° W.L. With respect to the PanAmSat satellites, the proposed new coverage area for the AMC-6 standard and extended Ku-band beam results from repointing the steerable beam towards the East, away from PanAmSat's spacecraft. Furthermore, neither PanAmSat spacecraft has extended Ku-band payload. With respect to the Nahuel 1, SES Americom indicates that it has negotiated a coordination agreement with Nahuelsat which permits use of the AMC-6 extended Ku-band capacity in North America and use of the spacecraft's standard and extended Ku-band payload to serve South America.

<sup>4</sup> The satellite's standard and extended Ku-band capacity can be switched between a movable North American beam and a steerable beam capable of providing service to South America. The C-band payload aboard the AMC-6 includes a movable North America beam.

- 1) Pursuant to footnote US337<sup>5</sup> of the U.S. Table of Allocations, 47 C.F.R. § 2.106, any earth station in the United States and its Possessions (US&P) communicating with AMC-6 in the 13.75-14.0 GHz frequency band is required to coordinate with the National Telecommunications and Information Administration's (NTIA's) Interdepartment Radio Advisory Committee's Frequency Assignment Subcommittee.<sup>6</sup>
- 2) Operations of any earth station in the US&P communicating with AMC-6 in the 13.75-14.0 GHz frequency band shall comply with footnotes US356 and US357 of the U.S. Table of Allocations<sup>7</sup> which specifies minimum antenna diameter of 4.5 meters and a minimum equivalent isotropically radiated power (e.i.r.p.). Operations of any earth station located outside the US&P communicating with AMC-6 in the 13.75-14.0 GHz frequency band, shall be consistent with footnotes 5.502 and 5.503 to the International Telecommunication Union (ITU) Radio Regulations,<sup>8</sup> which allow minimum antenna diameter as small as 1.2 meters for earth stations of a GSO FSS network.
- 3) The proposed 11.45-11.7 GHz extended Ku-band is allocated internationally and domestically to terrestrial services and to the FSS on a co-primary basis.<sup>9</sup> Footnote NG104 of the U.S. Table of Allocations<sup>10</sup> and footnote 2 of Section

<sup>5</sup> Footnote US337 requires that earth stations operating in the 13.75-13.8 GHz band be coordinated through the NTIA's IRAC's FAS to minimize interference to the forward space-to-space link of the National Aeronautics and Space Administration Tracking and Data Relay Satellite System. 47 C.F.R. § 2.106, US337.

<sup>6</sup> See Amendment of Parts 2, 25, and 90 of the Commission's Rules to Allocate the 13.75-14.0 GHz Band to the Fixed-Satellite Service, *Report and Order*, ET Docket No. 96-20, 11 FCC Rcd 11951, 11960-61 (para. 20) (1996).

<sup>7</sup> These footnotes place certain restrictions on FSS operations in order to protect Government operations in the band, including manned space flight. Footnote US356 to the U.S. Table of Allocations places a restriction on minimum antenna size of 4.5 meters for earth stations operating in the 13.75-14.0 GHz band and indicates a minimum equivalent isotropically radiated power (e.i.r.p.) that should be used. 47 C.F.R. § 2.106, Footnote US356. Footnote US357 to the U.S. Table of Allocations limits FSS earth station e.i.r.p. spectral density in the 13.77-13.78 GHz band until those GSO space stations in the space research service for which advance publication information was received by the ITU prior to January 31, 1992 cease to operate in this band. 47 C.F.R. § 2.106, Footnote US357.

<sup>8</sup> Footnote 5.502 to the ITU Radio Regulations establishes minimum antenna diameters for earth stations of geostationary and non-geostationary satellite networks, and places certain restrictions on either the minimum equivalent isotropically radiated power (e.i.r.p.) or the power flux density (p.f.d.) levels produced by earth stations operating in the 13.75-14.0 GHz band. Footnote 5.503 of the ITU Radio Regulations limits FSS earth station e.i.r.p. spectral density in the 13.770-13.780 GHz band for earth stations in the FSS operating with geostationary-orbit space stations, until those geostationary space stations in the space research service for which advance publication information was received by the ITU prior to January 31, 1992 cease to operate in this band.

<sup>9</sup> 47 C.F.R. §§ 2.106 and 25.202(a)(1).

<sup>10</sup> 47 C.F.R. § 2.106 footnote NG104 states "[t]he use of the bands 10.7-11.7 GHz (space-to-Earth) and 12.75-13.25 GHz (Earth-to-space) by the fixed-satellite service in the geostationary-satellite orbit shall be limited to international systems, *i.e.*, other than domestic systems."

25.202(a)(1)<sup>11</sup> of the Commission's rules limit FSS operations in these bands to international service only.<sup>12</sup> Accordingly, SES Americom's operations in the 11.45-11.7 GHz frequency band is limited to international services.

- 4) SES Americom's shall operate the AMC-6 satellite in accordance with all existing coordination agreements.
- 5) SES Americom is afforded thirty days from the date of release of this action to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
- 6) In light our action here, SES Americom's request for Special Temporary Authority (STA) File No. SAT-STA 20050819-00164 (filed August 19, 2005) is DISMISSED as moot.
- 7) This action is used pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

see also  
SAT-STA 20050819-  
00164.  
Dismissed as  
moot.



File # SAT-MOD-20050819-00163

Call Sign 5Z347 Grant Date 10/26/05  
(or other identifier)

From launch + operating Term Dates + 15 years. To: \_\_\_\_\_

Approved: [Signature]  
Policy Branch Chief  
w/conditions

<sup>11</sup> 47 C.F.R. § 25.202(a)(1) footnote 2 states "[u]se of this by geostationary satellite orbit satellite systems in the fixed-satellite service is limited to international systems; i.e., other than domestic systems."

<sup>12</sup> See *Satellite Services*, 26 RR 2d 1257, 1263-65 (1973), and *GWARC Inquiry*, 70 FCC 2d 1193, 1252 (1978). See also *Assignment of Orbital Locations to Space Stations in the Domestic Fixed Satellite Service and the Applications of GE American Communications, Inc., Order and Authorization*, 15 FCC Rcd 3385 (Sat. & Radiocomm. Div. 1999).

9-16. Name of Contact Representative

<b>Name:</b>	Karis A. 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 Thirteenth Street, NW	<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>Attention:</b>		<b>Relationship:</b>	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
- (N/A) b2. Application for Registration of New Domestic Receive-Only Station
- (N/A) b3. Amendment to a Pending Application
- (N/A) b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- (N/A) b7. Notification of Minor Modification
- (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- (N/A) b10. Other (Please specify)

17c. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).  
 Governmental Entity     Noncommercial educational licensee  
 Other (please explain):

17d.

Fee Classification BFY – Space Station Modification (Geostationary)

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:  
S2347

19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:

(a) Date pending application was filed:                      (b) File number:  
  
SATMOD2002110800209

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier     Non-Common Carrier

22. If earth station applicant, check all that apply.

- Using U.S. licensed satellites
- Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network     Not connected to a Public Switched Network     N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)     b. Ku-Band (12/14 GHz)
- c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower:    Frequency Upper: (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive    Transmit-Only    Receive-Only    N/A

"For Space Station applications, select N/A."



## PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a — authorization to add new emission designator and related service
- b — authorization to change emission designator and related service
- c — authorization to increase EIRP and EIRP density
- d — authorization to replace antenna
- e — authorization to add antenna
- f — authorization to relocate fixed station
- g — authorization to change frequency(ies)
- h — authorization to add frequency
- i — authorization to add Points of Communication (satellites & countries)
- j — authorization to change Points of Communication (satellites & countries)
- k — authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l — authorization to change orbit location
- m — authorization to perform fleet management
- n — authorization to extend milestones
- o — Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.  Yes  No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

Yes  No  N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

Exhibit A

#### BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?  
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes  No

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes  No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances:

Yes  No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes  No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes  No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

Exhibit B

41. 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

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.

Yes  No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

See Att. 1

Att. 1

**CERTIFICATION**

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing  
Nancy J. Eskenazi

46. Title of Person Signing  
Vice President and Associate General Counsel



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).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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 )  
SES AMERICOM, INC. ) File No. SAT-MOD-\_\_\_\_\_  
For Modification of AMC-6 )  
Fixed-Satellite Space Station License )

**APPLICATION OF SES AMERICOM, INC.**

SES Americom, Inc. ("SES Americom") hereby respectfully requests a modification of its license for the AMC-6 fixed-satellite space station to authorize use of the spacecraft's extended Ku-band payload and to permit service to South America in the standard and extended Ku-band. Grant of the requested authority will serve the public interest by allowing SES Americom to make efficient use of AMC-6 to meet customer requirements.

A completed FCC Form 312 is attached, and SES Americom incorporates by reference the technical information previously provided in support of AMC-6.<sup>1</sup> In addition, SES Americom is providing here technical information relating to the proposed changes in operation of AMC-6 at 72° W.L. on Schedule S and in narrative form pursuant to Section 25.114 of the Commission's Rules.

AMC-6 is a hybrid C-/Ku-band satellite that was launched on October 22, 2000, and is authorized to operate at the 72° W.L. orbital position. The spacecraft is equipped with an extended Ku-band payload. The satellite's standard

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<sup>1</sup> See File No. SAT-AMD-20000510-00089.



and extended Ku-band capacity can be switched between a movable North America beam and a steerable beam capable of providing service to South America. At the time AMC-6 was licensed, however, no use of the extended Ku-band frequencies or service to South America was proposed in order to accommodate international coordination agreements. Thus, the authority originally requested for AMC-6 was limited to operations in the standard C- and Ku-bands and to coverage of North America and the Caribbean.<sup>2</sup>

In order to respond to a customer requirement, SES Americom now seeks to modify the AMC-6 license to authorize operations in the extended Ku-band in both the North America beam and the steerable beam and to permit service to South America in the standard and extended Ku-bands. SES Americom has reached a coordination agreement with Nahuelsat, which operates the Nahuel 1 spacecraft at 71.8° W.L. The agreement permits use of the AMC-6 extended Ku-band capacity in North America and use of the spacecraft's standard and extended Ku-band payload to serve South America pursuant to specified conditions.

The requested modification of authority is in the public interest because it will permit efficient use of AMC-6 to meet customer needs consistent with efficient fleet management. The Commission has generally permitted satellite operators the flexibility to design and modify their networks in response to customer requirements, provided there are no compelling countervailing public

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<sup>2</sup> See *GE American Communications, Inc., Application for Authority to Launch and Operate a Replacement C/Ku Hybrid Fixed Satellite Service Space Station at 72° W.L.*, Memorandum Opinion, Order and Authorization, 15 FCC Rcd 19671 (Sat. & Radiocomm. Div. 2000).

interest considerations.<sup>3</sup> The modification proposed here will allow SES Americom to use available capacity on AMC-6 to respond to demand for new services. Grant of this application is consistent with the Commission's policy of allowing satellite operators to maximize the efficient use of spectrum and orbital resources consistent with customer requirements.

The proposed activation of the extended Ku-band payload and expansion of the AMC-6 coverage area will not result in harmful interference to operators of satellites at adjacent orbital positions. The closest Ku-band spacecraft to 72° W.L. are Nahuel 1 at 71.8° W.L. and PanAmSat's SBS-6 at 74.05° W.L. and Galaxy 3R at 73.95° W.L. As noted above, SES Americom has negotiated a coordination agreement with Nahuelsat that permits use of AMC-6's extended Ku-band payload and service to South America. SES Americom previously submitted an interference analysis demonstrating that operation of AMC-6 at 72° W.L. would not cause harmful interference to PanAmSat's operations at 74° W.L. No increase in interference to PanAmSat will result from the proposed modification of operations. The proposed new coverage area for the AMC-6 standard and extended Ku-band beam results from repointing the steerable beam towards the East, away

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<sup>3</sup> See, e.g. *AMSC Subsidiary Corporation*, 13 FCC Rcd 12316 at ¶ 8 (Int'l Bur. 1998). See also *Amendment of the Commission's Space Station Licensing Rules and Policies and 2000 Biennial Regulatory Review – Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations, Second Report and Order*, 18 FCC Rcd 12507 (2003) at ¶ 7 (“We have previously allowed satellite operators to rearrange satellites in their fleet to reflect business and customer considerations where no other public interest factors are adversely affected.”) (footnote omitted).

from PanAmSat's spacecraft. Furthermore, neither PanAmSat satellite has extended Ku-band frequencies, so the activation of the AMC-6 extended Ku-band payload will not affect PanAmSat's operations.

For the foregoing reasons, SES Americom seeks a modification of the AMC-6 license to authorize activation of the spacecraft's extended Ku-band payload and to permit service to South America in the standard and extended Ku-band from the 72° W.L. orbital location.

Respectfully submitted,

SES Americom, Inc.

By: /s/ Nancy J. Eskenazi

Nancy J. Eskenazi  
Vice President and  
Associate General Counsel  
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Dated: August 19, 2005