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BY ELECTRONIC FILING

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

**RE: File Nos. SAT-STA-20100408-00068 (Call Sign S2807) &
SES-STA-20100408-00420 (Call Sign KB27)
Notification of SES Americom, Inc. pursuant to § 1.65**

Dear Ms. Dortch:

SES Americom, Inc. (“SES Americom,” doing business as “SES WORLD SKIES”),¹ by its attorneys and pursuant to Section 1.65 of the Commission’s rules, hereby updates the above-referenced applications relating to in-orbit testing of the C-band payload on the SES-1 satellite (the “IOT Applications”).

As discussed in the IOT Applications, C-band testing of SES-1 will be performed with earth station KB27.² The testing will require the intermittent transmission of an unmodulated CW carrier for a short duration (less than five minutes) over a period of a couple of days.³

Uplink Characteristics: SES WORLD SKIES has confirmed that the C-band uplink transmissions from earth station KB27 during IOT will be within the limits for which that earth station has already been coordinated and licensed. Specifically, the KB27 license includes

¹ On September 7, 2009, SES S.A. announced that the newly integrated operations of its two indirect subsidiaries, New Skies Satellites B.V. and SES Americom would be conducted under a single brand name, SES WORLD SKIES. The new brand name does not affect the underlying legal entities that hold Commission authorizations or U.S. market access rights.

² IOT Applications, Attachment 1 at 1.

³ *Id.*, Narrative at 4 & Attachment 1 at 2-3.

authority for a carrier with the emission designator 3M00F8W, for which the specified maximum EIRP/carrier is 87.8 dBW, and the maximum EIRP density is 66.80 dBW/4 kHz.⁴ For the CW carrier, assuming a worst case scenario with a 1 kHz bandwidth, the maximum EIRP/carrier is 68 dBW, and the maximum EIRP density is 66.5 dBW/4 kHz. Thus, the licensed and coordinated limits in the KB27 license will not be exceeded during the temporary use of the CW carrier for C-band IOT.

Downlink Characteristics: As discussed in the IOT Applications, during the brief intermittent periods when the CW carrier is transmitting, the satellite's downlink power flux density ("PFD") will exceed the limits specified in Section 25.208(a) of the Commission's rules.⁵ SES WORLD SKIES requests any necessary waiver of Section 25.208(a) to permit satellite PFD in excess of the specified limits for purposes of SES-1 C-band IOT. Grant of the waiver will serve the public interest.

As SES WORLD SKIES explained in the IOT Applications, use of the CW carrier during IOT is necessary in order to verify the performance of the satellite in the linear and non-linear region and to precisely establish the operational point of the transponder amplifiers.⁶ Use of an unmodulated carrier to perform IOT is a long-standing industry practice and is expressly contemplated by the Commission's rules.⁷ SES WORLD SKIES has sought to minimize any potential impact by limiting the duration of the CW carrier transmissions. Furthermore, SES WORLD SKIES has requested authority to perform IOT on a non-interference basis and committed to immediately terminate transmissions upon notification of harmful interference.⁸ SES WORLD SKIES has also provided 24/7 contact information to ensure that any interference is immediately addressed.⁹ Under these circumstances, grant of a waiver to allow the PFD limit to be exceeded is consistent with Commission precedent.¹⁰

⁴ See Call Sign KB27, File No. SES-RWL-20081105-01451, granted Nov. 6, 2008, Section B, Particulars of Operations.

⁵ IOT Applications, Narrative at 4 & Attachment 1 at 2-3.

⁶ *Id.*, Attachment 1 at 2.

⁷ See 47 C.F.R. § 25.211(b) ("The transmission of an unmodulated carrier at a power level sufficient to saturate a transponder is prohibited, *except by the space station licensee to determine transponder performance characteristics.*") (emphasis added).

⁸ IOT Applications, Narrative at 7 & Attachment 1 at 3.

⁹ *Id.*, Narrative at 8.

¹⁰ See, e.g., *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (grant of a waiver "is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule.") (footnote omitted).

Ms. Marlene H. Dortch
April 21, 2010
Page 3

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

/s/ Karis A. Hastings

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