

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

In the Matter of Application of)	
)	
SES AMERICOM, INC.)	File No. SAT-STA-_____
)	Call Sign S2156
For Special Temporary Authority to)	
Position AMC-5 at 79.10° W.L. with)	
+/- 0.1 Degree East-West Stationkeeping)	

EXPEDITED ACTION REQUESTED

APPLICATION OF SES AMERICOM, INC.

SES Americom, Inc. (“SES Americom”) hereby respectfully requests special temporary authority (“STA”) for a period of thirty days to drift the AMC-5 Ku-band in-orbit spare satellite to 79.10° W.L. and maintain it there with an expanded east-west stationkeeping tolerance of +/- 0.1 degrees. Authority is sought for telemetry, tracking and command (“TT&C”) operations only – SES Americom does not seek to activate the communications payload during or after the drift. SES Americom respectfully requests action on this STA request by June 30, 2011. Grant of the requested authority will preserve AMC-5’s fuel and extend the satellite’s operational life, facilitating the spacecraft’s availability to provide future services.

AMC-5 currently is assigned to 79.05° W.L. with an east-west stationkeeping tolerance of +/- 0.05 degrees.¹ SES Americom also operates the AMC-2 C/Ku-band hybrid spacecraft at the nominal 79° W.L. orbital location, in the stationkeeping volume bounded by

¹ See File No. SAT-MOD-20100706-00154, Call Sign S2156 (“AMC-5 Modification”), grant-stamped Jan. 20, 2011 (“AMC-5 Modification Grant”), Attachment to Grant at ¶ 3. Thus, AMC-5’s current stationkeeping volume is bounded by 79.00° W.L. and 79.10° W.L.

78.90° W.L. and 79.00° W.L.² SES Americom relies primarily on AMC-2 to provide Ku-band services at this orbital location, with AMC-5 available to provide occasional use or back-up capacity as needed.³

In order to extend the fuel life of AMC-5, SES Americom requests STA to relax the stationkeeping constraints on AMC-5 to allow operation within a +/- 0.1 degree box. To avoid any overlap with the stationkeeping volume of AMC-2, SES Americom also proposes to shift the center of AMC-5's box slightly to 79.10° W.L. Action on the STA is requested by June 30 to allow SES Americom to take advantage of the westward drift of the satellite and avoid the next scheduled burn that would be needed to maintain AMC-5 within its current stationkeeping parameters.

Grant of the requested STA is consistent with Commission precedent and will not adversely affect other operators. The stationkeeping volume proposed for AMC-5 will not overlap with that of AMC-2 or any other spacecraft. The proposed STA does not alter the end-of-life disposal plan for AMC-5, which has already been approved by the Commission.⁴

Furthermore, the change will not cause harmful interference. The AMC-5 communications payload is currently carrying only occasional use traffic. During and after the proposed drift, SES Americom seeks authority to perform TT&C only, not to provide

² SES Americom has proposed to relocate AMC-2 later this year to the nominal 5° E.L. orbital location and to operate it there pursuant to Swedish licensing authority. *See* File No. SAT-T/C-20110527-00100 (“AMC-2 5° E.L. Application”).

³ As explained in the AMC-2 5° E.L. Application, SES Americom is in the process of transitioning all customer traffic off of AMC-2 in preparation for its planned relocation. *See id.*, Narrative at 3.

⁴ *See* AMC-5 Modification Grant, Attachment to Grant at ¶ 5.

communications services.⁵ AMC-5 TT&C will continue to be performed consistent with existing and future coordination agreements applicable to SES Americom's operations at the nominal 79° W.L. orbital location, including the coordination agreement addressing the Argentine Administration's ITU filings at 81° W.L.⁶

SES Americom seeks a limited waiver of Section 25.210(j) of the Commission's rules in connection with the requested AMC-5 STA. Grant of this waiver is consistent with Commission policy:

The Commission may waive a rule for good cause shown. 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. Generally, the Commission may grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.⁷

Section 25.210(j) specifies that geostationary space stations "must be maintained within 0.05° of their assigned orbital longitude in the east/west direction, unless specifically authorized by the Commission to operate with a different longitudinal tolerance." 47 C.F.R. § 25.210(j). The Commission has previously waived this rule based on a finding that allowing

⁵ The AMC-5 TT&C frequencies are as follows:
Command: 14001 (vertical polarization; uplink)
Telemetry: 11701 and 11702 (horizontal polarization; downlink).

⁶ SES Americom notes that the satellite positioned at 81° W.L., Intelsat 3R, performs its TT&C in C-band frequencies. See File No. SAT-STA-20100402-00063, Call Sign PAS-2R, grant-stamped Aug. 3, 2010, Attachment to Grant at 1.

⁷ *PanAmSat Licensee Corp.*, 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

an increased stationkeeping volume would “not adversely affect the operations of other spacecraft, and would conserve fuel for future operations.”⁸

The facts here fit squarely within this precedent. As discussed above, allowing AMC-5 to be maintained within an increased stationkeeping volume will not harm other operators. AMC-5’s stationkeeping volume will not overlap with that of any other satellites. Furthermore, the proposed TT&C operations will not materially affect the interference environment. Allowing AMC-5 to be flown at 79.10° W.L. in an expanded east-west stationkeeping volume of +/-0.1 degrees will result in fuel savings for the spacecraft. This will prolong the time during which AMC-5 will be available to provide service in response to customer requirements. Under these circumstances, grant of any necessary waiver of Section 25.210(j) will serve the public interest.

SES Americom 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.

SES Americom 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.

⁸ See, e.g., *SES Americom, Inc. Application for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, 11545 (Sat. Div. 2005).

For the foregoing reasons, SES Americom seeks temporary authority for a period of 30 days to perform TT&C in order to drift AMC-5 to 79.10° W.L. and maintain it there with an expanded east-west stationkeeping tolerance of +/- 0.1 degrees.

Respectfully submitted,

SES AMERICOM, INC.

By: /s/ Daniel C.H. Mah

Of Counsel

Karis A. Hastings
Hogan Lovells US LLP
555 13th Street, N.W.
Washington, D.C. 20004-1109
Tel: (202) 637-5600

Daniel C. H. Mah
Regulatory Counsel
SES Americom, Inc.
Four Research Way
Princeton, NJ 08540

Dated: June 14, 2011