

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

In the Matter of Application of)
)
SES AMERICOM, INC.) File No. SAT-STA-_____
) Call Sign S2134
For Special Temporary Authority to)
Relocate AMC-2 to 80.85° W.L. +/- 0.15 degrees)

APPLICATION OF SES AMERICOM, INC.

SES Americom, Inc. (“SES Americom,” doing business as “SES”) hereby respectfully requests special temporary authority (“STA”) for a period of sixty days beginning on or about April 1, 2013, to relocate the AMC-2 fixed-satellite space station from 19.0° E.L. to 80.85° W.L. with an east-west stationkeeping tolerance of +/- 0.15 degrees, where it will be co-located with SES’s AMC-5 satellite. Specifically, SES requests authority to perform Telemetry, Tracking and Command (“TT&C”) using certain C-band and Ku-band frequencies¹ in order to relocate AMC-2 from 19.2° E.L. to 80.85° W.L., and authority to operate both the TT&C and communications payloads on AMC-2 after it has arrived. SES will operate AMC-2 at 80.85° W.L. in accordance with the International Telecommunication Union (“ITU”) filings and coordination agreements of the Argentine Administration. Grant of the requested authority will serve the public interest by allowing SES to use AMC-2 to meet the requirements of its customer, Empresa Argentina de Soluciones Satelitales S.A. (“AR-SAT”), and expand the services available from the nominal 81° W.L. orbital location.

¹ The AMC-2 TT&C frequencies and nominal polarizations are as follows:
Command: 6423.5 MHz (vertical polarization; uplink)
Telemetry: 3700.5 MHz (vertical polarization; downlink), 4199.5 MHz (vertical polarization; downlink), and 12198.0 MHz (horizontal polarization; downlink).

SES has separately filed today a modification application to reassign AMC-2 to 80.85° W.L. +/- 0.15 degrees for operations in accordance with the Argentine ITU filings.² Pending action on the modification, SES seeks authority to allow it to commence relocation of AMC-2 to 80.85° W.L. If authorized to redeploy AMC-2, SES will do so at its own risk and understands that such authority would be without prejudice to any action the Commission ultimately may make regarding the application to reassign AMC-2 to 80.85° W.L. As discussed herein, grant of the requested authority is consistent with Commission precedent³ and will serve the public interest.

AMC-2 is a hybrid C/Ku-band satellite that is currently licensed by the FCC to operate at 19.0° E.L. with an east-west stationkeeping tolerance of +/- 0.1 degrees under the ITU satellite network filings of the Luxembourg Administration.⁴ SES proposes to relocate AMC-2 to the nominal 81° W.L. orbital location (at 80.85° W.L. to be precise), where it will operate under the ITU satellite network filings of the Argentine Administration. The redeployment of AMC-2 will not impact continuity of operations at the nominal 19.2° E.L. location as any traffic on that satellite will be transferred to other spacecraft in the SES fleet prior to relocation.

Grant of the requested authority to relocate and operate AMC-2 will serve the public interest and is consistent with Commission precedent. The Commission has repeatedly

² See File No. SAT-MOD-20130225-00024. SES incorporates by reference the supporting materials that were filed with the modification application.

³ The Commission has routinely authorized operators to commence relocation of a satellite pending a request to reassign the satellite. See, e.g., *SES Americom, Inc.*, Call Sign S2135, File No. SAT-STA-20100525-00108 (grant-stamped July 12, 2010) (authorizing SES to drift AMC-4 from 101° W.L. to 67° W.L. pending action on the related modification application to reassign the satellite).

⁴ See File No. SAT-MOD-20120524-00087, grant-stamped July 25, 2012 (the “*AMC-2 19.2° E.L. Grant*”).

observed that its policy is to allow “satellite operators to rearrange satellites in their fleet to reflect business and customer considerations where no public interest factors are adversely affected.”⁵ As the International Bureau has explained:

the Commission attempts, when possible, to leave spacecraft design decisions to the space station licensee because the licensee is in a better position to determine how to tailor its system to meet the particular needs of its customers. Consequently the Commission will generally grant a licensee’s request to modify its system, provided there are no compelling countervailing public interest considerations.⁶

Here, the proposed change will allow SES to make efficient use of AMC-2 in order to expand the available capacity at the nominal 81° W.L. orbital location. At that location, AMC-2 will supplement the service being provided by the Ku-band only AMC-5 spacecraft by adding South American C-band and Ku-band coverage to AMC-5’s North American Ku-band coverage.⁷ SES will coordinate internally to ensure compatibility of Ku-band operations between AMC-2 and AMC-5.

Reassignment of AMC-2 to 81.2° W.L. will not adversely affect other operators. SES will operate only the TT&C frequencies of AMC-2 during the drift. SES will follow standard industry practices for coordination of TT&C transmissions during the relocation process. Once AMC-2 arrives at 80.85° W.L., SES will operate the satellite pursuant to Argentine ITU filings and in conformance with Argentina’s coordination agreements regarding that location.

⁵ *SES Americom, Inc.*, Order and Authorization, DA 06-757 (IB rel. Apr. 7, 2006) at 4, ¶ 8, citing *Amendment of the Commission’s Space Station Licensing Rules and Policies*, Second Report and Order, 18 FCC Rcd 12507, 12509, ¶ 7 (2003).

⁶ *AMSC Subsidiary Corp.*, Order and Authorization, DA 98-493, 13 FCC Rcd 12316 (IB 1998) at 12318, ¶ 8 (footnote omitted).

⁷ See File No. SAT-MOD-20110929-00192, grant-stamped Mar. 2, 2012.

SES 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 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.

For the foregoing reasons, SES respectfully requests STA to relocate AMC-2 from 19.0° E.L. to 80.85° W.L. +/- 0.15 degrees beginning on or about April 1, 2013.

Respectfully submitted,

SES AMERICOM, INC.

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