

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

In the Matter of Application by)
)
SES AMERICOM, INC.) Call Sign S2415
)
For Special Temporary Authority to Operate)
AMC-12 Outside its Assigned Stationkeeping Box)

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

SES Americom, Inc. (“SES”) respectfully requests space station special temporary authority (“STA”) through February 15, 2016, to permit operations of the AMC-12 space station slightly outside its assigned stationkeeping volume at 37.45° W.L. +/- 0.05 degrees. SES has determined that due to an inaccuracy in ranging data, AMC-12 is operating at a minor offset (approximately 0.045 degrees) to the east of its assigned orbital location. Grant of the requested STA will serve the public interest by permitting SES a reasonable time in which to correct the excursion and will not adversely affect any other authorized operations.

The license for AMC-12 authorizes operations at 37.45° W.L. +/- 0.05 degrees, adjacent to the assignment for the Telstar 11N spacecraft.¹ Information derived from routine ranging calculations indicates that AMC-12 is located within its assigned east-west stationkeeping tolerance. However, SES has become aware of location data for AMC-12 that is inconsistent with SES’s ranging information. SES commenced an inquiry to determine which

¹ At one point, AMC-12 and Telstar 11N were both assigned to 37.5° W.L., but the operators requested and were granted authority to modify their licensed orbital positions so there would be no overlap in the satellites’ stationkeeping volumes. *See* Call Sign S2415, SAT-MOD-20050325-00077, grant-stamped May 5, 2005 (modifying the AMC-12 license to allow operation at an offset from the satellite’s prior position of 37.5° W.L.); Call Sign S2357, SAT-MOD-20060821-00091, grant-stamped Sept. 28, 2007 (authorizing the launch of Telstar 11N to the 37.55° W.L. orbital location, rather than to 37.5° W.L.).

position information was correct, including requesting that a third party perform an assessment of the AMC-12 orbit using its optical network and associated software. The results of that assessment indicated that instead of operating between 37.4° W.L. and 37.5° W.L. as specified in the satellite's license, AMC-12 was instead operating between 37.355° W.L. and 37.455° W.L. The bias in the ranging results appears to be the result of inaccurate range calibration data provided by the satellite's manufacturer relating to the spacecraft's signal processing delay. The manufacturer supplies this data to a satellite's operator based on tests prior to launch, and no further verification of the data can be performed once the satellite is in orbit.

Based on the results of its inquiry, SES has concluded that correction is needed to the satellite's orbit to account for the longitude bias introduced by the faulty range calibration data. However, in order to avoid the possibility of service disruptions, SES determined that it should notify AMC-12 customers prior to executing this correction so they can make plans to monitor the satellite's position and adjust antenna pointing as needed. SES has accordingly scheduled the correction to occur during the period from February 12-15, and has supplied this information to AMC-12 customers.

Temporary operation of the AMC-12 satellite outside its assigned stationkeeping volume will not cause harmful interference to the operations of any other spacecraft. The nearest C-band satellite operating to the east of AMC-12 is Intelsat 903 at 34.5° W.L. Even with the slight eastward bias introduced by the incorrect ranging data, AMC-12 is still separated from Intelsat 903 by approximately 2.9 degrees.

Nor will there be any impact on the physical operations of any other spacecraft. As discussed above, the closest satellite to AMC-12 is Telstar 11N, which is assigned to operate between 37.5° W.L. and 37.6° W.L. The eastward bias in the AMC-12 ranging data results in

AMC-12 operating slightly farther away from the Telstar 11N stationkeeping volume. The closest satellite to the east of AMC-12 is Eutelsat 36 West A, almost a degree and a half away at 36° W.L. Under these circumstances, grant of STA for temporary operation of AMC-12 slightly outside its assigned stationkeeping volume is consistent with Commission precedent² and will permit SES to return AMC-12 to its assigned position in an orderly fashion following notice to customers.

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.

For the foregoing reasons, SES respectfully requests authority for temporary operations of AMC-12 outside its assigned stationkeeping volume as described herein.

Respectfully submitted,

SES Americom, Inc.

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² 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) (authorizing operations in an increased east-west stationkeeping volume based on a finding that there would be no adverse effect on adjacent satellite operations).