

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

In the Matter of	)	
	)	
SES AMERICOM, INC.	)	File No. SAT-STA-_____
	)	Call Sign S2135
Request for Special Temporary Authority to	)	
Drift AMC-4 Fixed-Satellite Space Station to	)	
134.85° W.L.	)	

**REQUEST OF SES AMERICOM, INC.**

SES Americom, Inc. (“SES”) hereby respectfully requests special temporary authority (“STA”) for a period of 60 days<sup>1</sup> beginning on or before June 14, 2017, to permit relocation of the AMC-4 C/Ku-band fixed-satellite space station. Specifically, SES seeks authority to drift AMC-4 from its current position at 67.0° W.L. to 134.85° W.L. and maintain it at that location using certain C-band and conventional Ku-band frequencies for Telemetry, Tracking and Command (“TT&C”).<sup>2</sup> SES will shortly file a modification application requesting reassignment of AMC-4 to 134.85° W.L. and seeks STA pending submission of and action on this modification application. Grant of the requested authority will serve the public interest by allowing SES to begin the drift of AMC-4 to an orbital location where it will meet customer requirements for additional Ku-band capacity to facilitate the delivery of in-flight broadband service to passengers and crew members traveling on U.S. airlines.

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<sup>1</sup> SES is requesting STA for a period of 60 days; however, if the Commission determines it is not able to grant STA for that period, SES will accept an authorization for 30 days.

<sup>2</sup> The AMC-4 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 (horizontal polarization; downlink), and  
11702.0 MHz (horizontal polarization; downlink)  
12198.0 MHz (vertical polarization; downlink).

AMC-4 is a hybrid C/Ku-band satellite that is licensed to operate pursuant to Commission authority at 67° W.L.<sup>3</sup> On March 30, 2017, SES's affiliate, New Skies Satellites B.V., successfully launched its SES-10 satellite, which will ultimately operate at 66.9° W.L.<sup>4</sup> The satellite is expected to arrive at its operational orbital location following in-orbit testing by the middle of May. Once it has arrived and customer traffic is successfully transferred from AMC-4 to SES-10, AMC-4 will become available for relocation. SES has a customer requirement to provide aeronautical service over the Pacific Ocean. Relocating AMC-4 to the nominal 135° W.L. orbital location will support this requirement by adding Ku-band capacity at an orbital location where such capacity is not available today.

The Commission has generally permitted satellite operators the flexibility to design and modify their networks in response to customer requirements, absent compelling countervailing public interest considerations.<sup>5</sup> Here, grant of the requested STA will permit SES to begin drifting the satellite to accommodate the customer's time frame and facilitate efficient use of AMC-4 to provide service to customers.

Authorizing the drift will not adversely affect other operators. The proposed station keeping volume for AMC-4 will not overlap with that of any other spacecraft. The closest satellites to AMC-4 will be other SES satellites, AMC-7 and AMC-10, both of which operate at 135.0° W.L. with an east-west station keeping tolerance of +/-0.05 degrees. SES will

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<sup>3</sup> See SES Americom, Inc., Call Sign S2135, File No. SAT-MOD-20140606-00059, granted Sept. 23, 2014.

<sup>4</sup> See New Skies Satellites B.V., Call Sign S2950, File No. SAT-MPL-20170108-00002, granted Mar. 22, 2017.

<sup>5</sup> See, e.g. *AMSC Subsidiary Corporation*, 13 FCC Rcd 12316 at ¶ 8 (IB 1998) (the Commission generally leaves space station design decisions to the licensee "because the licensee is in a better position to determine how to tailor its system to meet the particular needs of its customers") (footnote omitted).

use only the TT&C frequencies of AMC-4 during the drift and will follow standard industry practices for coordination of TT&C transmissions during the relocation process.

For the foregoing reasons, SES respectfully requests grant of STA to permit relocation of AMC-4 pending submission of and action on the forthcoming AMC-4 modification application.

Respectfully submitted,

SES AMERICOM, INC.

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Dated: May 3, 2017