

**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)	
Position and Operate the AMC-4 Fixed-Satellite)	
Space Station at 85° W.L.)	

Expedited Action Requested

REQUEST OF SES AMERICOM, INC.

SES Americom, Inc. (“SES”) respectfully requests special temporary authority (“STA”) for a period of 30 days beginning no later than June 29, 2017, to permit SES to temporarily locate the AMC-4 C/Ku-band fixed-satellite space station at 85° W.L. At that position, AMC-4 will briefly take on traffic currently carried by SES’s AMC-6 satellite, making AMC-6 available for relocation to 83° W.L. to restore service affected by a recent anomaly on AMC-9. SES seeks authority to (1) temporarily locate AMC-4 at 85.0° W.L. and maintain it at that location using certain C-band and conventional Ku-band frequencies for Telemetry, Tracking and Command (“TT&C”);¹ and (2) operate the conventional and extended Ku-band communications payloads to serve customers currently using AMC-6 during the relocation of that satellite to 83° W.L. Grant of the requested authority will serve the public interest by allowing SES to offer a long-term solution for customers whose service on AMC-9 was interrupted by the anomaly.

¹ The AMC-4 TT&C frequencies and nominal polarizations are as follows:

<u>Command</u> :	6423.5 MHz (vertical polarization; uplink)
<u>Telemetry</u> :	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).

As SES previously notified the Commission, on June 17, 2017, the AMC-9 satellite assigned to 83° W.L. experienced an anomaly of unknown origin. Due to this anomaly, the satellite is not responding to commands, and SES is unable to maintain the satellite in its assigned stationkeeping volume. SES received STA for 30 days to continue communications with the satellite for TT&C purposes only.² A significant portion of the traffic that had been carried by AMC-9 has been transitioned to SES's AMC-6 satellite, which was recently relocated to 85° W.L. pursuant to Commission authority.³

In response to the anomaly, SES has developed a plan to restore long-term service to the customers previously using AMC-9 at 83° W.L. and seeks the necessary authority to implement the solution as quickly as possible. Initially, SES's AMC-4 satellite, which recently began drifting to 134.9° W.L. pursuant to STA,⁴ will stop temporarily at 85° W.L. on or around June 29, 2017. SES will transfer active traffic currently on AMC-6 at 85° W.L. to AMC-4, which is identical to AMC-6 in configuration, frequency plan and coverage.⁵ Once the traffic has been transferred, which is expected to be completed early on June 30, AMC-6 can be relocated to 83.0° W.L.⁶ After AMC-6 arrives at 83.0° W.L. on or around July 3, SES will transfer all of the traffic from AMC-4 back to AMC-6. Following completion of that traffic transfer on or before July 7, 2017, AMC-4 will resume its drift to the nominal 135° W.L. orbital location.

² See SES Americom, Inc., File No. SAT-STA-20170619-00091, granted June 17, 2017.

³ See SES Americom, Inc., File No. SAT-MOD-20170316-00051 (the "AMC-6 Modification"), granted June 14, 2017.

⁴ SES Americom, Inc., File No. SAT-STA-20170503-00070, granted June 7, 2017.

⁵ AMC-4's communications operations will match that of AMC-6; however, AMC-4's TT&C operations will use polarizations opposite to those of AMC-6's TT&C operations.

⁶ SES is simultaneously filing a separate STA request to drift AMC-6 to, and operate it at, 83.0° W.L.

SES has entered into an agreement with EchoStar Satellite Operating Corporation (“EchoStar”), which holds the license for the Ku-band payload of the AMC-16 Ku/Ka-band spacecraft located at 85° W.L.,⁷ to operate AMC-4 temporarily at 85° W.L. in order to facilitate the relocation of AMC-6 to 83° W.L. and to restore customers affected by the AMC-9 anomaly.

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.⁸ Here, the requested authority is necessary to provide a quick and long-term solution to restore service for customers, including the U.S. Department of Defense, that were affected by the AMC-9 anomaly.

Furthermore, authorizing the drift will not adversely affect other operators. AMC-4 and AMC-6 were designed and built to the same specifications. As a result, the operations of AMC-4 will be virtually identical to AMC-6’s licensed operations at 85° W.L. as described in the AMC-6 Modification. During the roughly 24-hour period when AMC-4 is co-located with other SES satellites at 85° W.L., SES will closely control the satellites to ensure their safe operation.

⁷ See File No. SAT-ASG-20141020-00111.

⁸ 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).

For the foregoing reasons, SES respectfully requests grant of STA to permit the temporary positioning and operation of AMC-4 at 85° W.L.

Respectfully submitted,

SES AMERICOM, INC.

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